LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

FINAL
ENVIRONMENTAL IMPACT REPORT

Addendum No. 3 to the Final Environmental Impact Report for the West Adams New Community Plan

Environmental Case: ENV-2008-478-EIR
State Clearinghouse No.: SCH No. 2008021013

Project Location: 5850 W. Jefferson Boulevard

Community Plan Area: West Adams-Baldwin Hills-Leimert

Council District: 10—Wesson

Project Description: The Project Site, located at 5850 W. Jefferson Boulevard, is approximately 197,412 square feet (approximately 4.53 acres) and is accessible via Jefferson Boulevard. The Applicant is proposing to redevelop a portion of the Project Site by replacing the existing surface parking area with an approximately 344,947 square foot office building that is approximately 320 feet (22 stories) in height. Approximately 908 vehicle parking spaces would be provided in four subterranean parking levels and limited surface parking, and the 5850 Project would also include approximately 104 bicycle parking spaces (including 69 long-term bicycle parking spaces and 35 short-term bicycle parking spaces). The existing approximately 49,877 square foot media production building would remain on-site. Upon completion, the Project Site would include approximately 394,824 square feet of floor area.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
CAJA Environmental Services, LLC

APPLICANT:
5850 West Jefferson, LLC

August 2020

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ADDENDUM TO THE EIR

1. Introduction

Project Title: Addendum No. 3 to the Final Environmental Impact Report for the West Adams New Community Plan

Environmental No.: ENV-2008-478-EIR

State Clearinghouse: 2008021013

Project Location: 5850 West Jefferson Boulevard, Los Angeles, CA, 90016 (Project Site or Site)

Lead Agency: City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 750, Los Angeles, CA 90012

Applicant: 5850 West Jefferson, LLC
587 Grapevine Drive, Corona, CA 92882

Prepared By: CAJA Environmental Services, LLC
15350 Sherman Way, Suite 315, Van Nuys, CA 91406

Pursuant to the California Environmental Quality Act (CEQA), a Final Environmental Impact Report (EIR) was prepared and certified for the West Adams–Baldwin Hills–Leimert New Community Plan (SCH No. 20080210113). The Final EIR document is hereinafter referred to as the "Certified EIR." The Certified EIR consists of a Project EIR.

This document is an addendum to the Certified EIR and has been prepared to evaluate potential environmental effects that may be associated with proposed changes in the previously approved West Adams–Baldwin Hills–Leimert New Community Plan (or "Approved Project"). These modifications are related to a development at the above listed address (described in full in subsection 1.3, 5850 Project, below). Two addenda to the Certified EIR have been previously prepared. Addendum No. 1 was prepared in April 2018, for the properties located at 5870, 5880, and 5890 Jefferson Boulevard and 5869, 5871, 5877, and 5901 Rodeo Road. Addendum No. 1 examined the request for a zone and height district change to modify the floor area ratio (FAR) for these properties from 1.5:1 FAR to 2:1 FAR, and to move these properties from Parcel Group A to Parcel Group F in the Jefferson/La Cienega TOD Subarea of the West Adams Community Plan Implementation Overlay (CPIO) District. Addendum No. 2 was prepared in December 2018, for the properties located at 3235 – 3243 Hutchison Avenue and 8695 Washington Boulevard. Addendum No. 2 examined the request to add an additional office above an existing two-story automated parking structure in the Helms Bakery District.

The Certified EIR for the Approved Project included a comprehensive revision of the adopted 1998 West Adams Community Plan. The Approved Project included new policies and programs, as well as zone changes, General Plan land use designation changes, district amendments, and establishes overlay zones. The zoning designations served to regulate development standards such as: heights of structures, setbacks, lot coverage, density and intensity, open space, use of land, parking, and design. A CPIO was also established to regulate development that is consistent with the General Plan, to enhance the unique character of neighborhoods, and to address growth within the West Adams Community Plan Area (CPA). While the policies and programs contained within the West Adams New Community Plan do apply throughout the CPA, only certain portions of the CPA were proposed to undergo zoning and land use changes. The change areas were classified into different types: CPIO District subareas and Specific Plan Amendment change areas, nomenclature change areas, and zone changes to establish consistency.

1.1 Project Location

The West Adams CPA is located approximately seven miles southwest of Downtown Los Angeles and contains approximately 8,710 acres (approximately 13.61 square miles) of land area. The West Adams CPA is generally bordered on the north by Pico and Venice Boulevards; on the west by Robertson Boulevard and the eastern limits of Culver City; on the south by the Baldwin Hills, City of Inglewood, and portions of unincorporated Los Angeles County; and to the east by Arlington and Van Ness Avenues. The West Adams CPA is one of 35 Community Plans in the City of Los Angeles and is bordered by the South Los Angeles CPA on the east, the Wilshire CPA on the north, and portions of the West Los Angeles and Palms-Mar Vista-Del Rey CPAs on the west. The Santa Monica Freeway (I-10) is the only freeway traversing the West Adams CPA. Major north-south corridors include Arlington Avenue, Crenshaw Boulevard, La Brea Avenue, Fairfax Avenue, La Cienega Boulevard, and Robertson Boulevard. Major east-west corridors include Pico Boulevard, Venice Boulevard, Washington Boulevard, Adams Boulevard, Jefferson Boulevard, Exposition Boulevard, Martin Luther King Jr. Boulevard, Leimert Boulevard, Slauson Avenue, and Florence Avenue. See Figure 1-1 for a regional location map of the Community Plan Area.

1.2 Approved Project (Certified EIR)

The West Adams-Baldwin Hills-Leimert New Community Plan (Approved Project) is a comprehensive revision of a planning document, the adopted 1998 West Adams Community Plan. In order to implement the Approved Project, an EIR was certified in 2016, to assess its potential environmental effects and propose mitigation measures, as needed. The Approved Project included new policies and programs, as well as zone changes, General Plan land use designation changes, district amendments, and established overlay zones. The zoning designations would serve to regulate development standards such as: heights of structures, setbacks, lot coverage, density and intensity, open space, use of land, parking, and design. See Figure 1-2 for a Community Plan land use designation map.

The Approved Project included the environmental analysis of implementing an ordinance that was intended to:

- Guide development through 2030;
- Refine and amend the existing 1996 General Plan Framework Element;
- Initiate General Plan Amendments and Zone Changes as necessary to implement the General Plan and accomplish the stated goals and policies of the New Community Plan program;
- Amend and establish Overlay Districts, Specific Plans, and/or special districts to portions of the West Adams New Community Plan, as necessary to implement the General Plan Framework and community plan policies; and
- Refine and amend any applicable City-Wide Elements of the General Plan.

The CPIO District was established to regulate development that is consistent with the General Plan, to enhance the unique character of neighborhoods, and to address growth within the West Adams CPA. While the policies and programs contained within the Community Plan apply throughout the CPA, only certain portions of the CPA were proposed to undergo zoning and land use changes. The change areas were classified into different types: CPIO District subareas and Specific Plan Amendment change areas, nomenclature change areas, and zone changes to establish consistency. The nomenclature change areas were changes in name only; densities, heights, and land uses did not change in these areas as a result of the Approved Project. Other zone change adjustments simply maintained consistency between existing land uses and the General Plan.

The CPIO District subareas and Specific Plan Amendment change areas incorporated locations where "active" changes were made. These changes primarily pertained to properties located along many of the major commercial and industrial corridors of the CPA, as well as the Transit-Oriented Development (TOD) areas located directly adjacent to the operating Metro Expo Light Rail Transit Line and the Crenshaw/LAX Light Rail Transit Line, currently under construction. Existing development parameters along these corridors and TOD areas were tailored in a manner that directs future growth away from adjacent residential neighborhoods toward higher-intensity commercial center locations and areas in proximity to public transit. Figure 1-3 provides a map of the Jefferson/La Cienega TOD Subarea boundaries.

In addition to policies addressing the distribution of land uses and building intensity, the proposed West Adams New Community Plan also addressed mobility, historic preservation, urban design, provisions for public infrastructure, public safety, and healthy and sustainable communities.

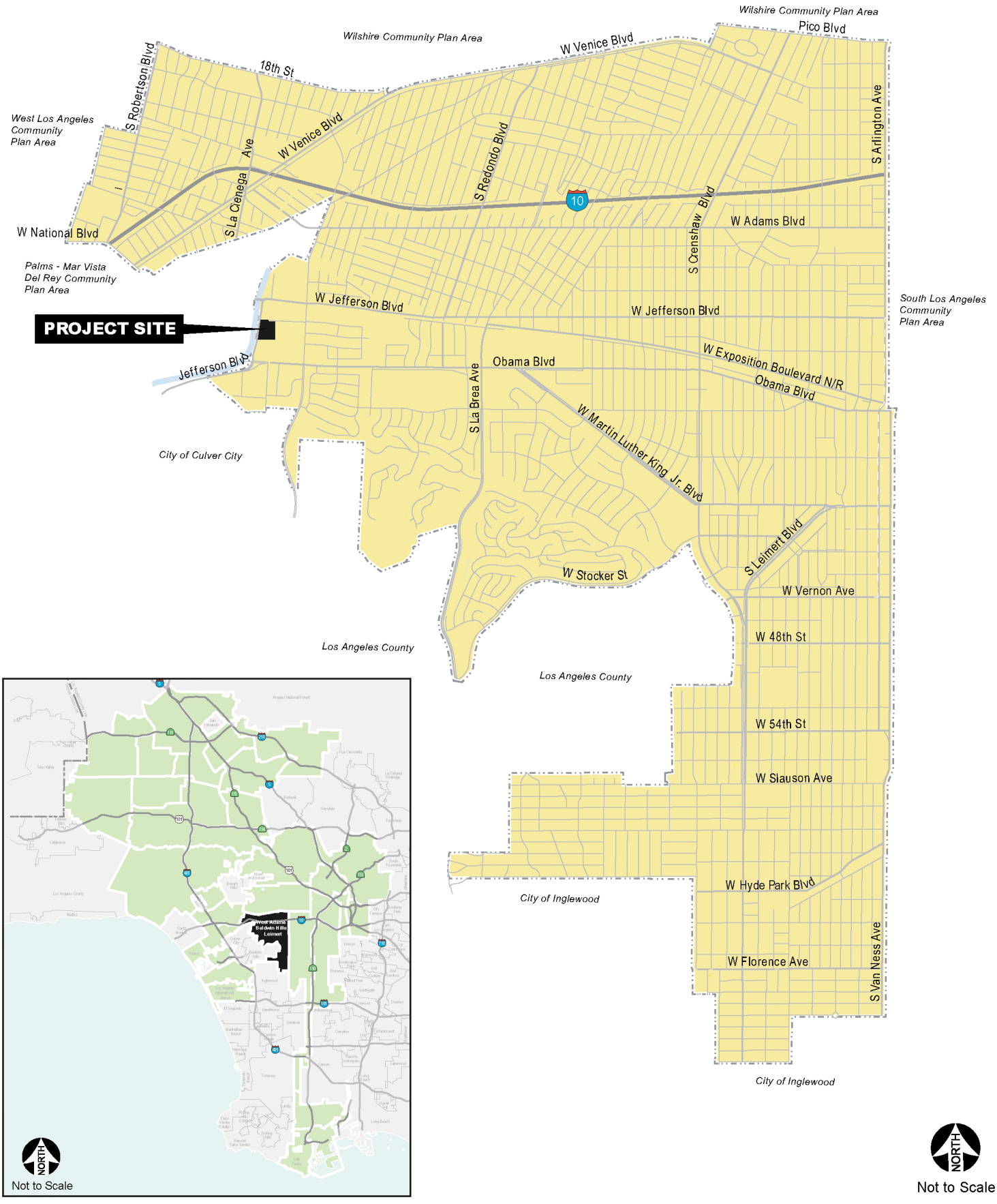


Figure 1-1
Regional Location

Source: Los Angeles Department of City Planning, 2016.

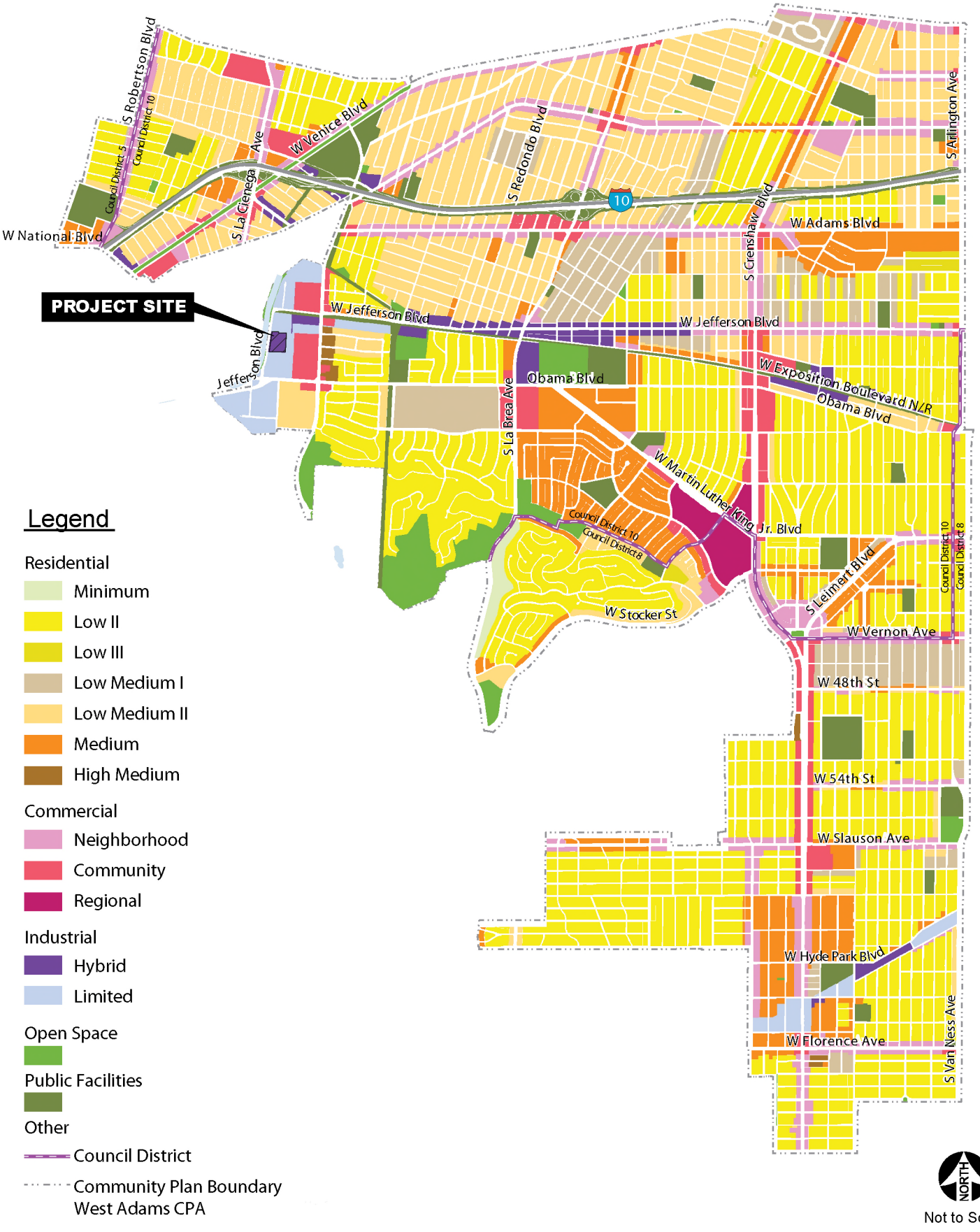


Figure 1-2
Community Plan Land Use Designations

Source: City of Los Angeles Planning Department, February 2019.

Source: Los Angeles Department of City Planning, 2019.

Figure 1-3
Jefferson/La Cienega TOD Subarea Boundary Map

1.3 Project (Addendum)

1.3.1 Project Setting

The current Project is an update to a property within the Approved Project area located at 5850 West Jefferson Boulevard (Project Site) that is approximately 197,412 square feet (approximately 4.53 acres) in lot area and is accessible via Jefferson Boulevard. Figure 1-4 provides a regional location map of the Project Site and Figure 1-5 provides an aerial view of the Project Site.

The Project Site is located within the CM-2D-CPIO zone and has a General Plan land use designation of Hybrid Industrial. The Project Site is located within the Jefferson/La Cienega TOD Subarea of the CPIO District. This Subarea identifies specific blocks surrounding the Metro Expo Line, La Cienega/Jefferson Station, and provides specific use limitations, development standards, and streetscape guidelines for projects to facilitate Transit Oriented Development (TOD). This Subarea identifies parcels where a range of development heights and intensities are permitted. The Jefferson/La Cienega TOD Subarea advances the creation of an employment destination outside of the City Center where a mix of uses that feature emerging and innovative commercial, office, "clean-tech," "information technology," and other "high tech" uses can locate in proximity to existing and future residences within a medium to high intensity transit hub.

1.3.2 Project Description

Specifically, the Applicant is proposing to redevelop a portion of the Project Site by replacing the existing surface parking area with an approximately 344,947 square foot office building that is approximately 320 feet (22 stories) in height. Approximately 908 vehicle parking spaces would be provided in four subterranean parking levels and limited surface parking, and the 5850 Project would also include approximately 104 bicycle parking spaces (including 69 long-term bicycle parking spaces and 35 short-term bicycle parking spaces).[1] The existing approximately 49,877 square foot media production building would remain on-site. Upon completion, the Project Site would include approximately 394,824 square feet of floor area.

The 5850 Project[2] plans are provided in Figures 1-6 through 1-20, elevations are provided in Figures 1-21 through 1-24, sections are provided in Figures 1-25 and 1-26, and a conceptual view is provided in Figure 1-27.

Design

The design of the 5850 Project is comprised of four components (see Figure 1-28). The first built component is the four levels of subterranean parking, and the second is composed of four

[1] A portion of the surface parking (approximately 26 spaces) for the existing building would remain with development of the 5850 Project.

[2] Throughout this Addendum, the current Project will be referred to as the 5850 Project.

on-grade, green-roofed office spaces – one at each of the four corners of the Project Site. The third component, the base, contains three floors with a trussed perimeter, designed to accommodate large horizontal expanses of flexible office, meeting, and production uses, located centrally within the base. The fourth component, the tower, emerges vertically from the base. It begins with a circular plan at a 49-foot height, and evolves in shape to a simple rectangular plan at a roof deck top. Each floor perimeter differs slightly from the adjacent floors above and below as the tower gradually transitions from round to rectangular. Stairs, elevators, bathrooms, and mechanical equipment are contained in the two vertical cores, which begin in the garage, pass through the base, and emerge from the curtain wall as external elements as the tower ascends.

Further, the design of the 5850 Project incorporates a green roof located at grade over the subterranean parking with extensive landscaping (approximately 47,854 square feet) in the form of a mixture of trees, paths, and green landscape. Seating, gathering, and pedestrian paths culminate on the Project Site with a park venue that surrounds the building and roofs. The landscape plan is provided in Figure 1-29.

The 5850 Project enhances the existing streetscape and pedestrian environment with all parking provided in four subterranean levels and limited surface parking, rather than an above-grade parking podium. This design allows for a park-like setting and lush green inviting spaces for users of the Project Site, as well as the community in general. The pedestrian and streetscape design is further enhanced by the tower design, which occupies only approximately 28 percent of the Project Site. Approximately 51 percent of the Project Site will be open space, in the form of extensive landscaping, seating and gathering areas, and pedestrian paths that result in a park-like venue surrounding the building. As a result, the 5850 Project design promotes both pedestrian and transit connectivity, consistent with the Project Site's location in a Transit Priority Area.

Access

Access to the Project Site would be provided from Jefferson Boulevard via two private driveways. One existing driveway, on the northern portion of the Project Site, would be used for access to the loading area. The second driveway would be located at the southern portion of the Project Site, and would include a new signalized intersection.[3]

Sustainability Features

The 5850 Project would comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2016 California Green Building Standards Code (CalGreen) (Part 11 of Title 24, California Code of Regulations). In addition, each entrance of the building is framed by an outdoor courtyard flanked by landscaped mounds that widen and slope up to 18 feet at the façade of the base of the building. The mounds provide sun and wind protection near building entrances. The street trees all along the west edge and trees along the north and east edges of

[3] Access to the existing building and a portion of surface parking on the Project Site would remain with development of the 5850 Project.

the building provide additional shade on the Project Site. There is an existing full-height hedge along the south property line that provides additional protection. Green roof spaces cover the subterranean parking structure, and portions of the ground level to reduce heat gain within the building and heat island effect on the Project Site.

Construction

Schedule

The anticipated construction schedule is approximately 30 months, with the 5850 Project becoming operational in 2023. It is expected that approximately 214,991 cubic yards of dirt would be exported from the Project Site. Table 1.3-1, below, summarizes the 30-month construction schedule used in this Addendum.

Table 1.3-1
Estimated Construction Schedule

Phase	Duration
Demolition	Months 1-2
Grading	Months 3-8
Building Construction	Months 9-30
Paving	Months 28-29
Architectural Coatings	Months 24-29
Source: DKA Planning, 2019	

Haul Route

Trucks traveling to the Chiquita Canyon Landfill from the Project Site would exit the Project Site and turn right onto Jefferson Boulevard, left on La Cienega Boulevard, slight right onto Fairfax Avenue, and left onto the I-10 westbound on-ramp. For trucks returning to the Project Site from the Chiquita Canyon Landfill, trucks would exit the I-10 eastbound at the Fairfax Avenue off-ramp, turn right onto Fairfax Avenue, left on La Cienega Boulevard, right on Jefferson Boulevard, and left into the Project Site. The proposed haul routes are shown in Figures 1-30 and 1-31.

1.3.3 Discretionary Actions and Approvals for the 5850 Project

1. Pursuant to **LAMC Sections 12.32 and 13.14**, an **Amendment to the West Adams Community Plan Implementation Overlay District (CPIO Amendment)**, to amend provisions applicable to Parcel E only with regards to maximum building height and maximum individual floor height in CPIO Sections V-2(A)(1)(c) and V-2(A)(1)(e). The maximum building height proposed is 320 feet, and the maximum individual floor height proposed is up to 37 feet with atrium space up to 52 feet in height;

2. Pursuant to **LAMC Section 12.24.X.22,** a **Zoning Administrator Determination** regarding transitional height to exceed the height limit of 61 feet within 100 to 199 feet of an OS zone;

3. Pursuant to **LAMC Section 16.05**, a **Site Plan Review** for the addition of over 50,000 square feet of non-residential floor area;

4. Pursuant to **LAMC Section 12.37.I**, Waiver of Street Dedication and/or Improvement for the Bureau of Engineering requested dedication along West Jefferson Boulevard and any revocable permit or street vacation that may be deemed necessary;

5. Approval of a haul route;

6. Subdivision of the Project Site, including a tract map, parcel map, and/or lot line adjustment;

7. Construction permits, including building, grading, excavation, foundation, temporary street closures, and associated permits; and

8. Approval of a CPIO Administrative Clearance and other discretionary and ministerial permits and approvals that may be deemed necessary.

Other than as described above, the 5850 Project would not change any of the land uses and development parameters with respect to any other aspect of the West Adams-Baldwin Hills-Leimert New Community Plan. All applicable mitigation measures, regulatory measures, and conditions of approval under the Approved Project (Certified EIR) would remain in effect for the 5850 Project.

Legend

Project Site

Source: Google Maps 2019.

Figure 1-4
Regional Location Map

Legend

Project Site

Source: Google Maps 2019.

Figure 1-5
Aerial Map

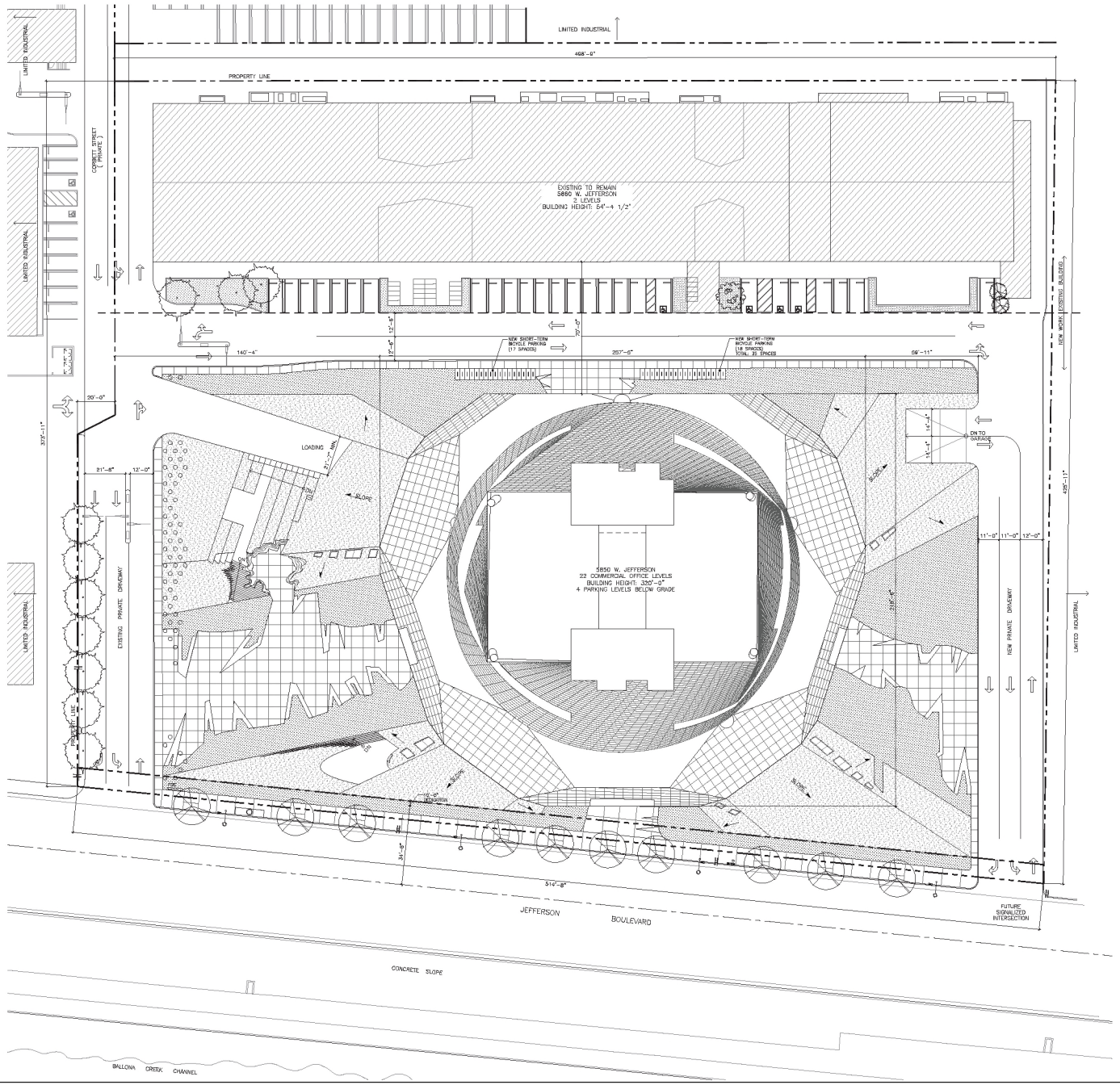
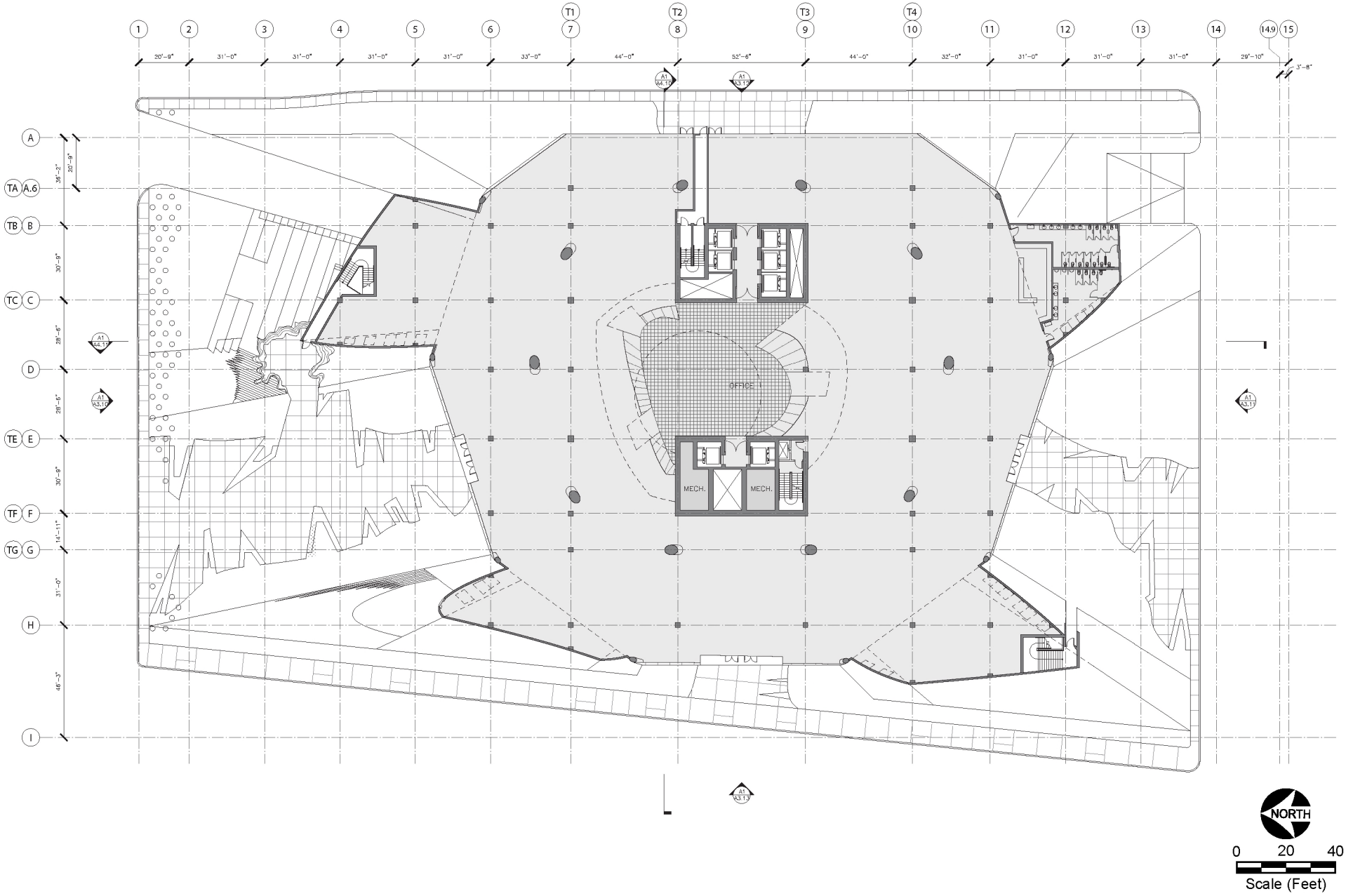


Figure 1-6
Plot Plan

Source: Eric Owen Moss Architects, 08/22/2019.



Source: Eric Owen Moss Architects, 08/22/2019.

Figure 1-7
Level 1

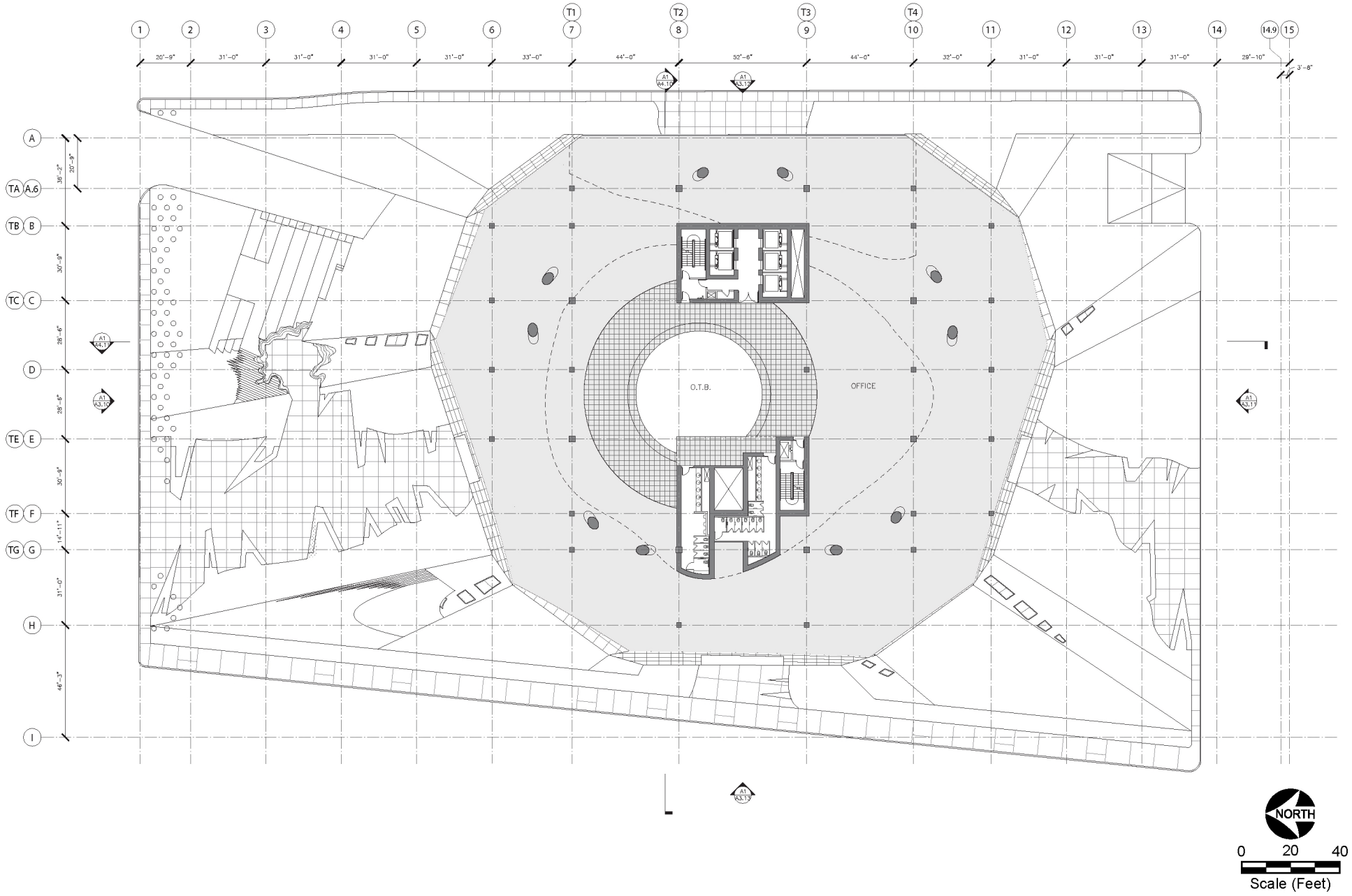
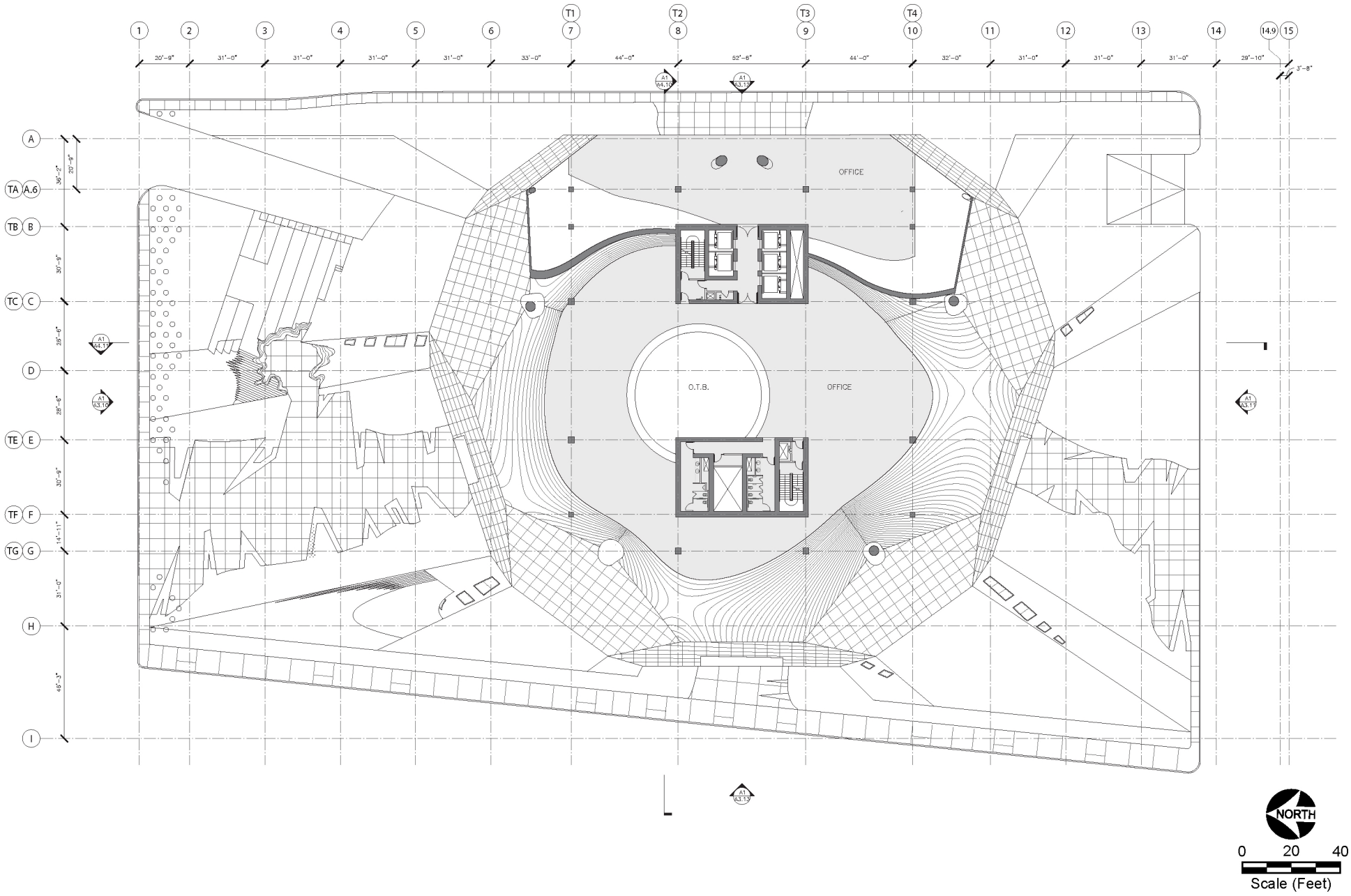


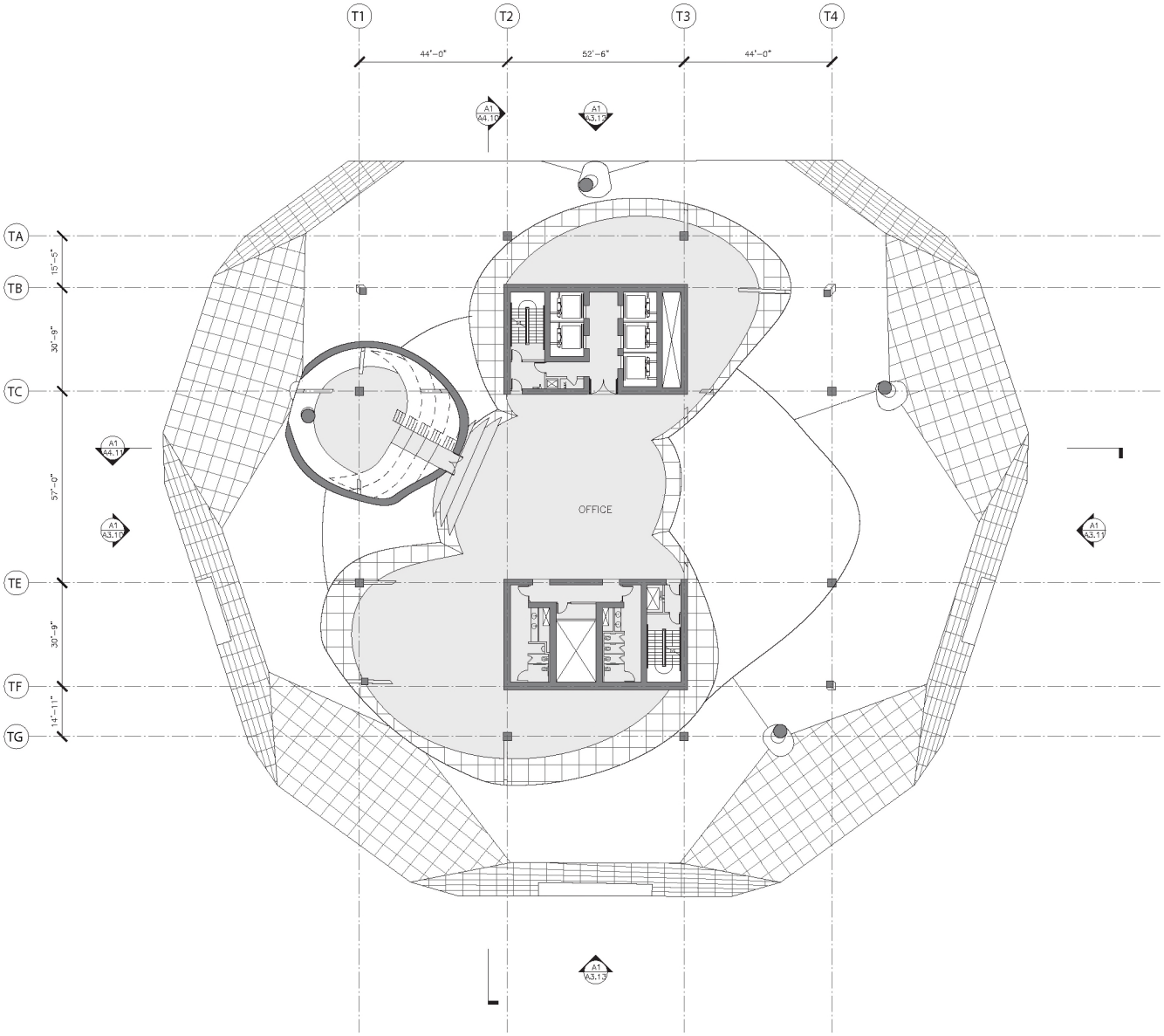
Figure 1-8
Level 2

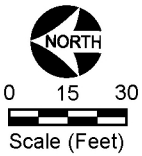
Source: Eric Owen Moss Architects, 08/22/2019.



Source: Eric Owen Moss Architects, 08/22/2019.

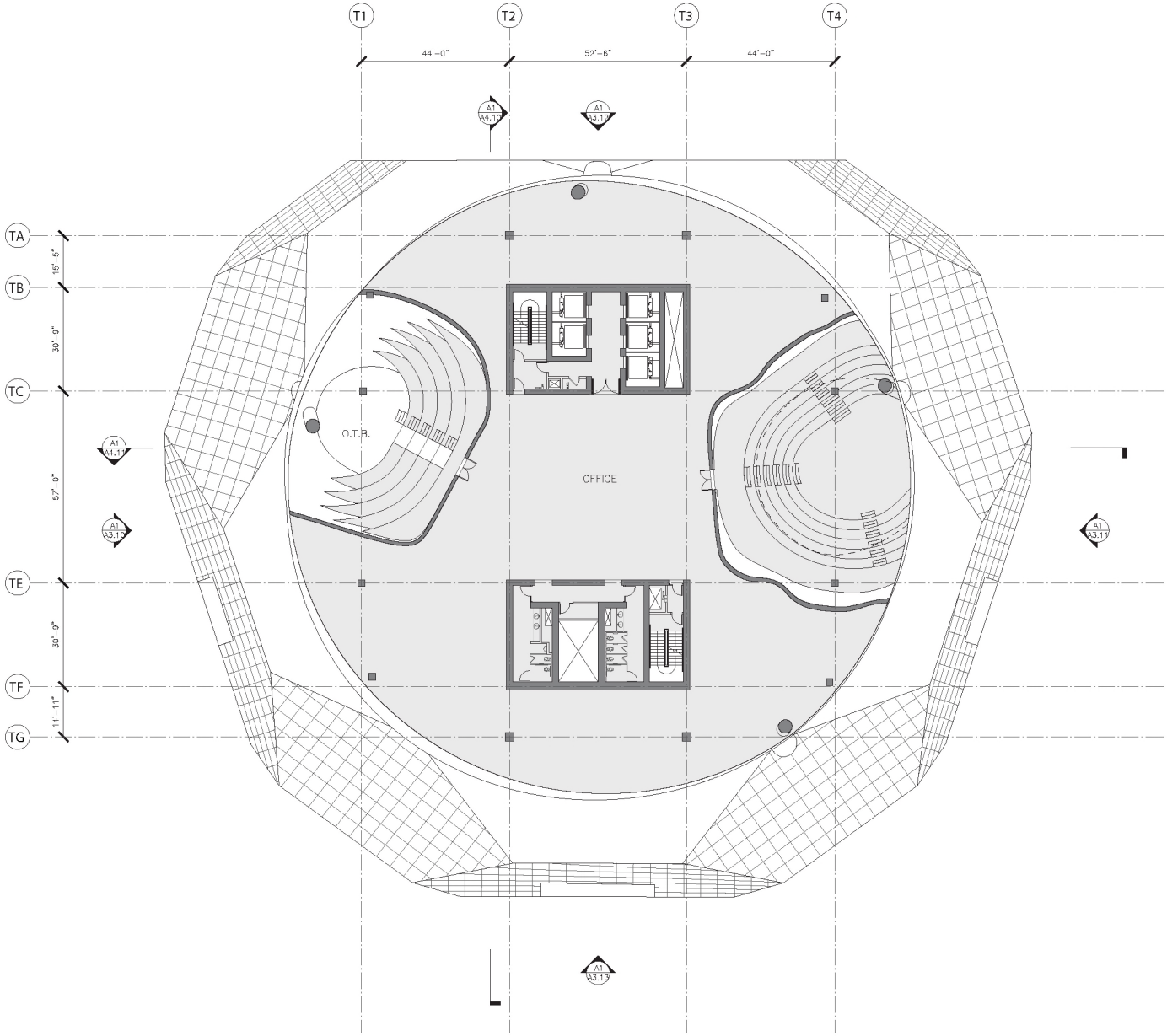
Figure 1-9
Level 3





Source: Eric Owen Moss Architects, 08/22/2019.

Figure 1-10
Level 4



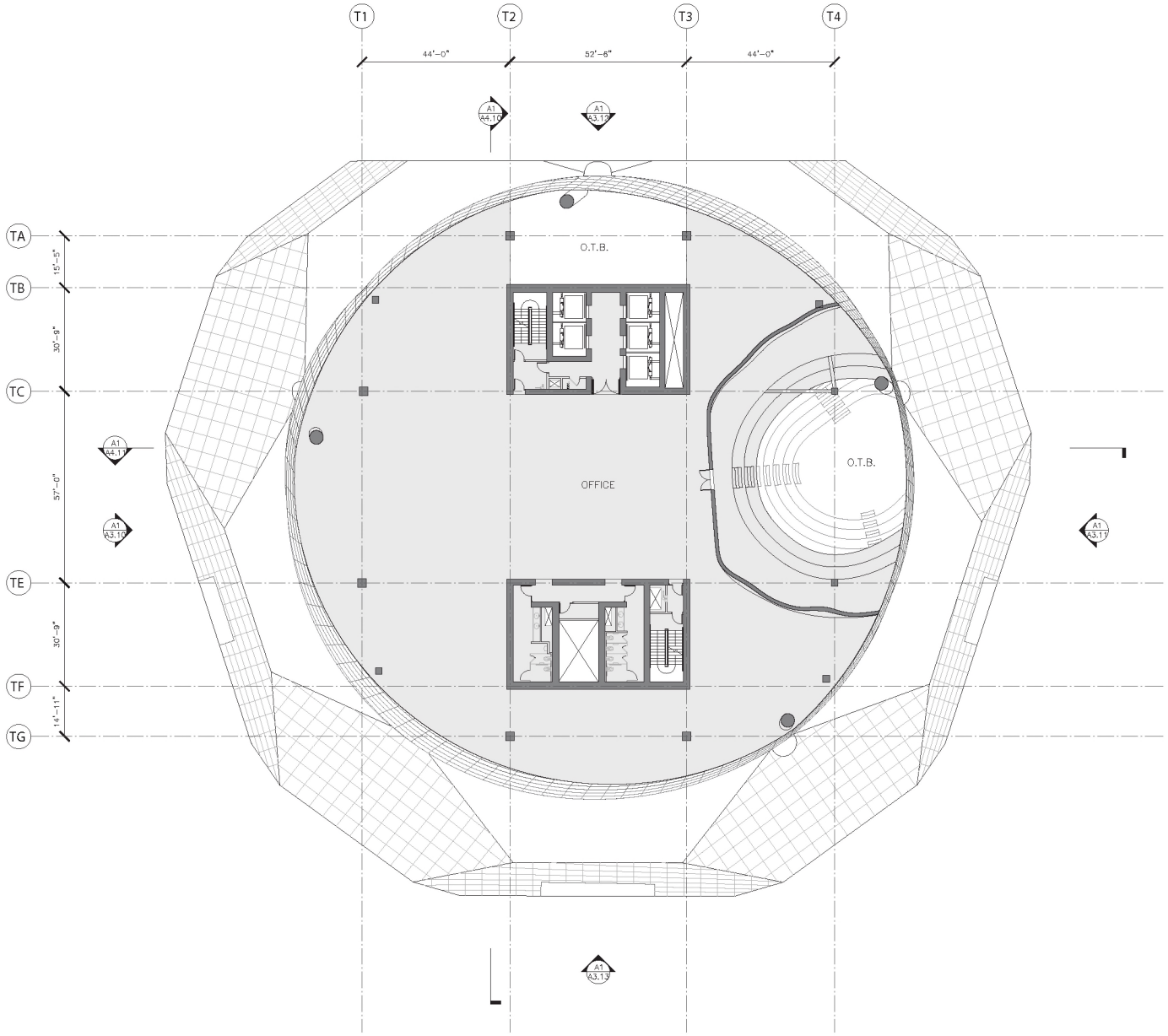
NORTH

0 15 30

Scale (Feet)

Figure 1-11
Level 5

Source: Eric Owen Moss Architects, 08/22/2019.



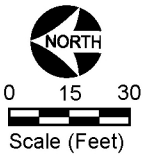
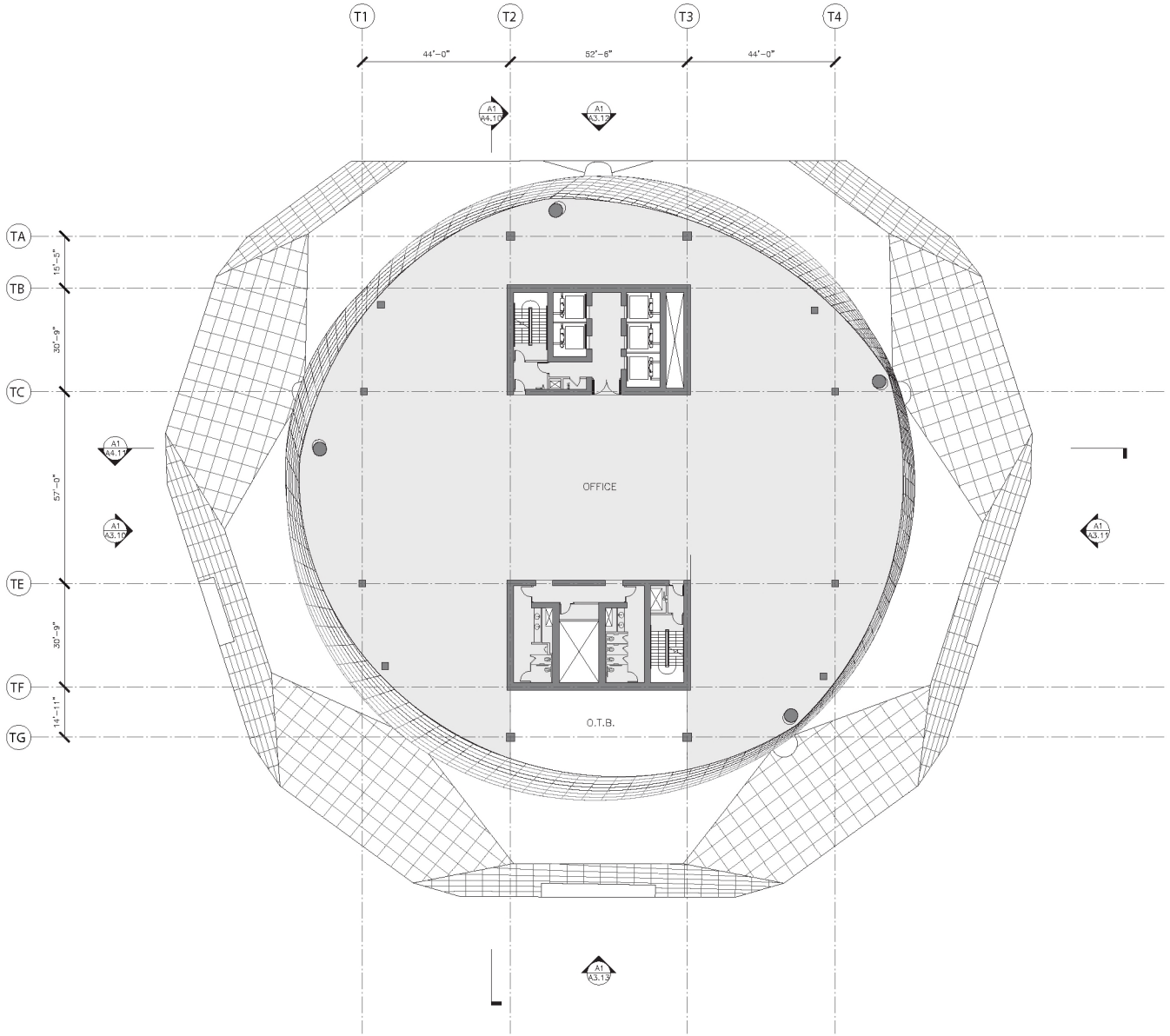


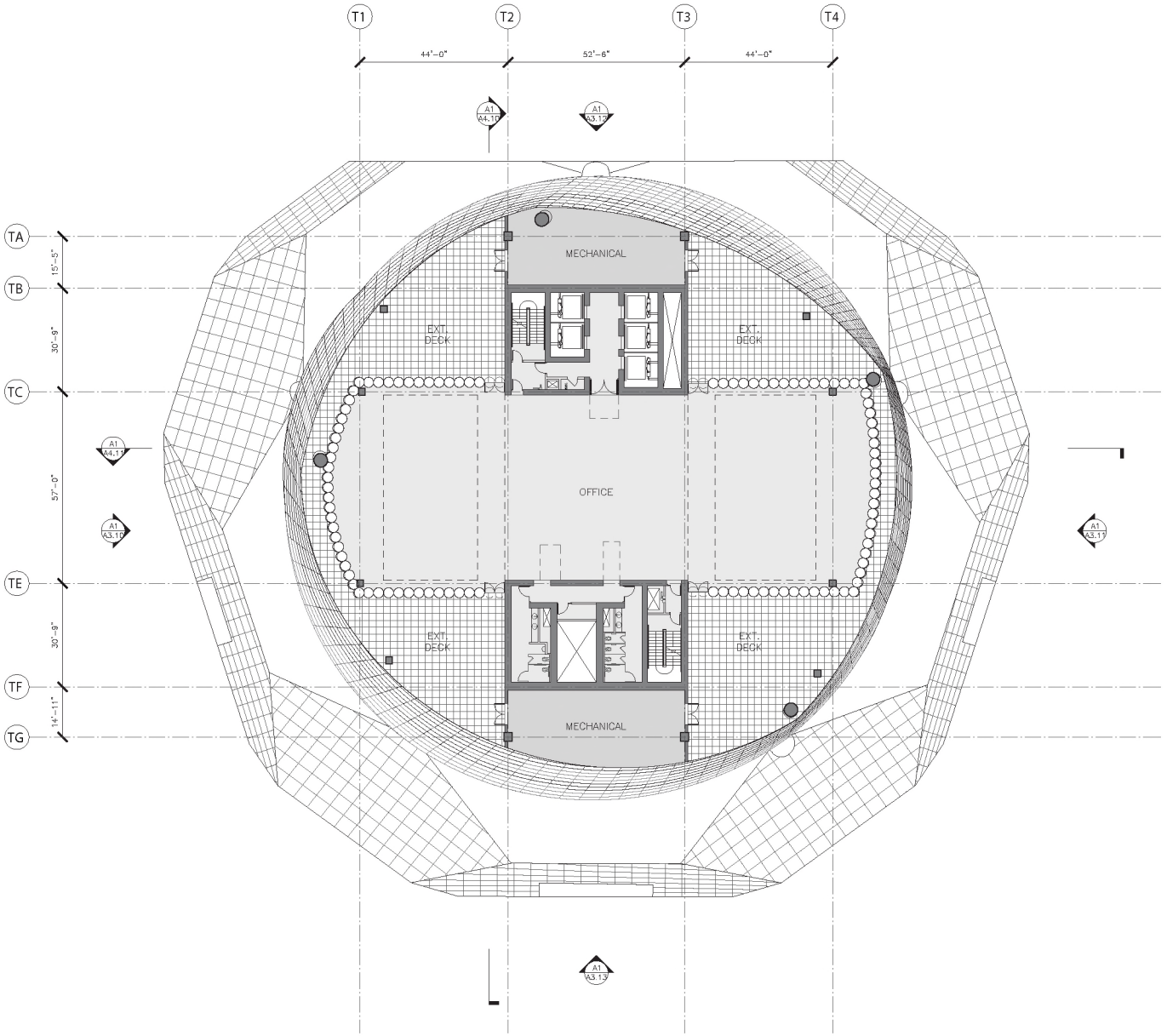
Figure 1-12
Level 6

Source: Eric Owen Moss Architects, 08/22/2019.



Source: Eric Owen Moss Architects, 08/22/2019.

Figure 1-13
Level 7



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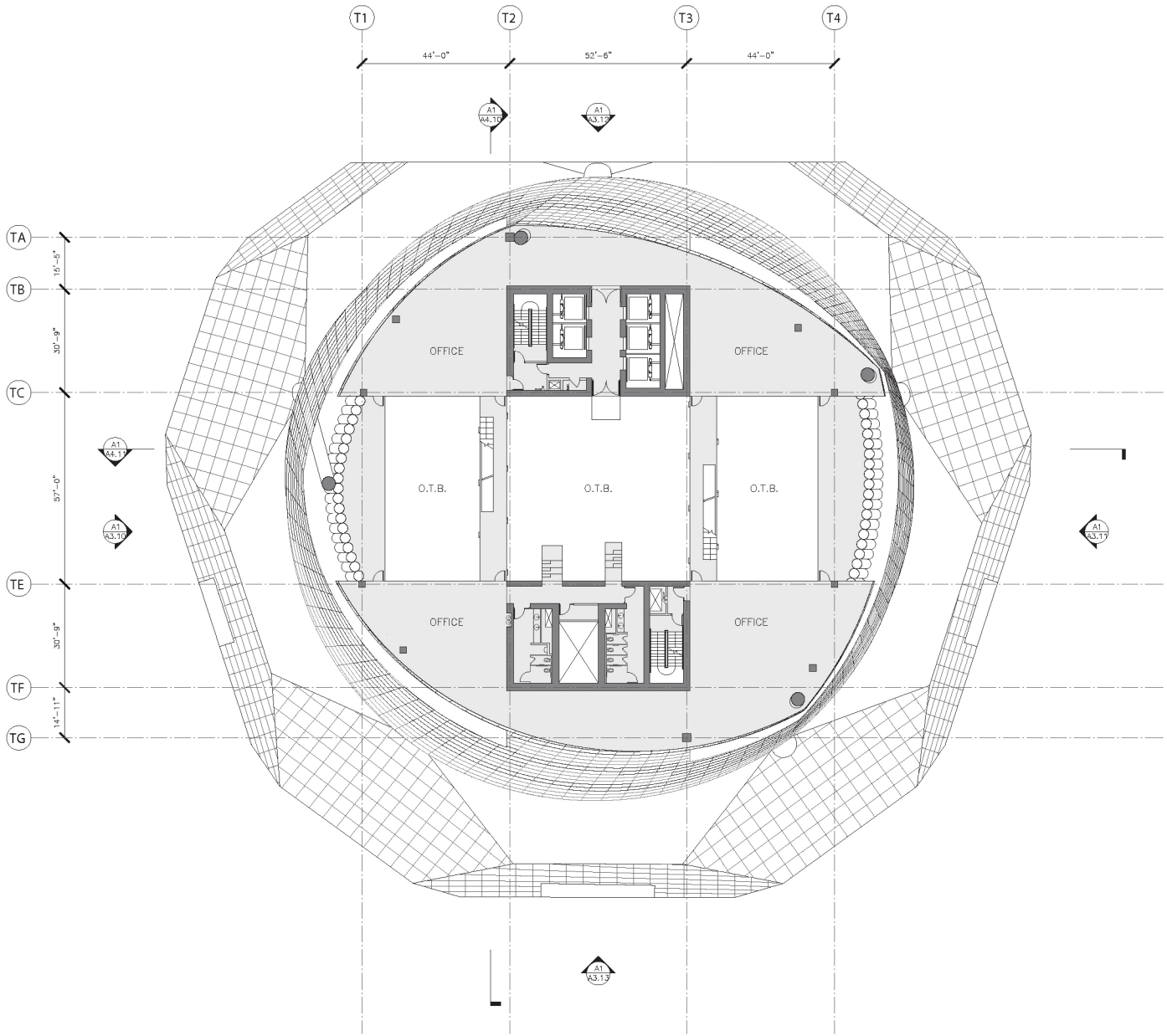
Scale (Feet)

Figure 1-14
Level 8

Source: Eric Owen Moss Architects, 08/22/2019.



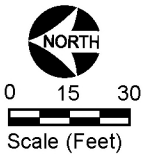
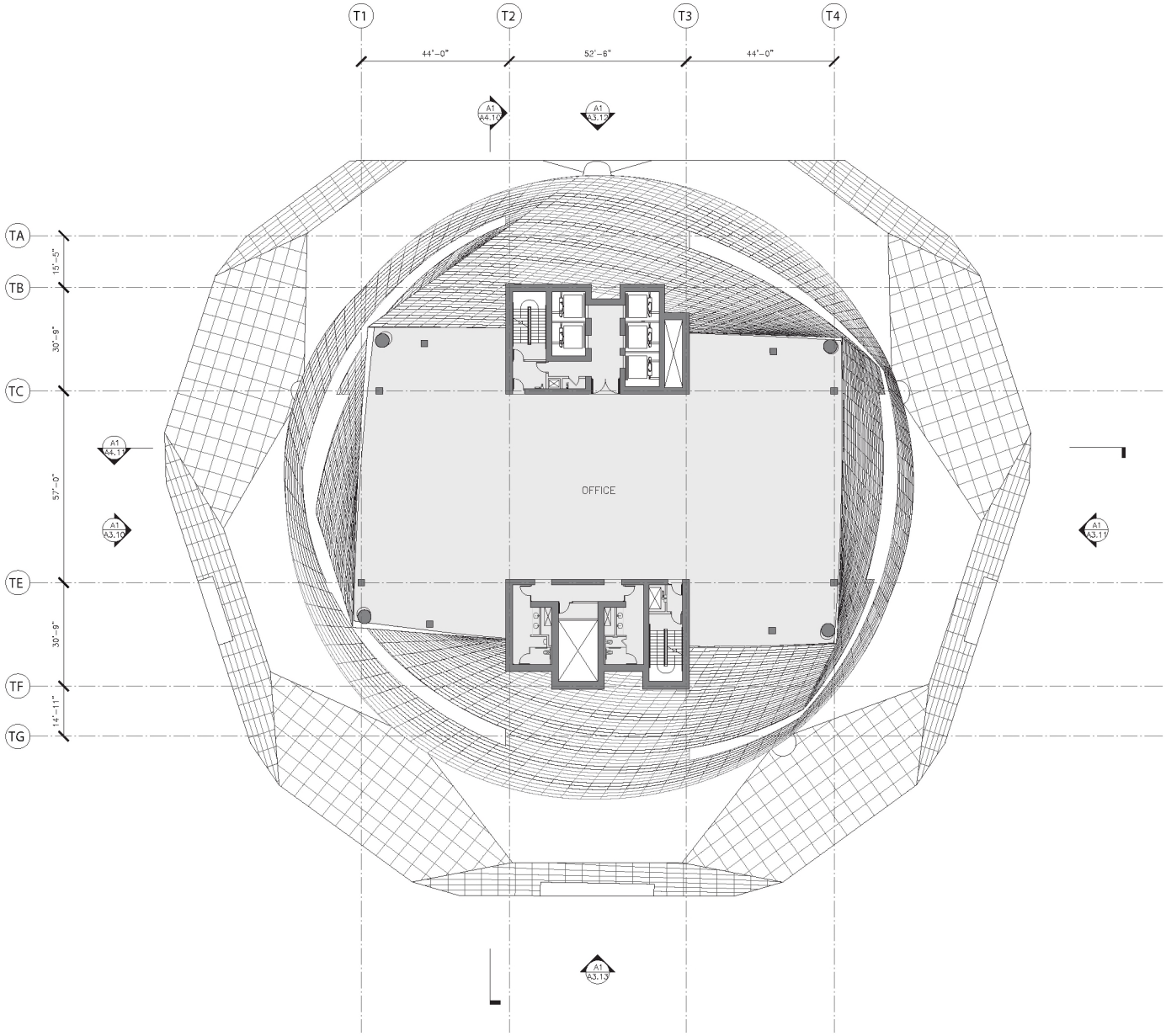


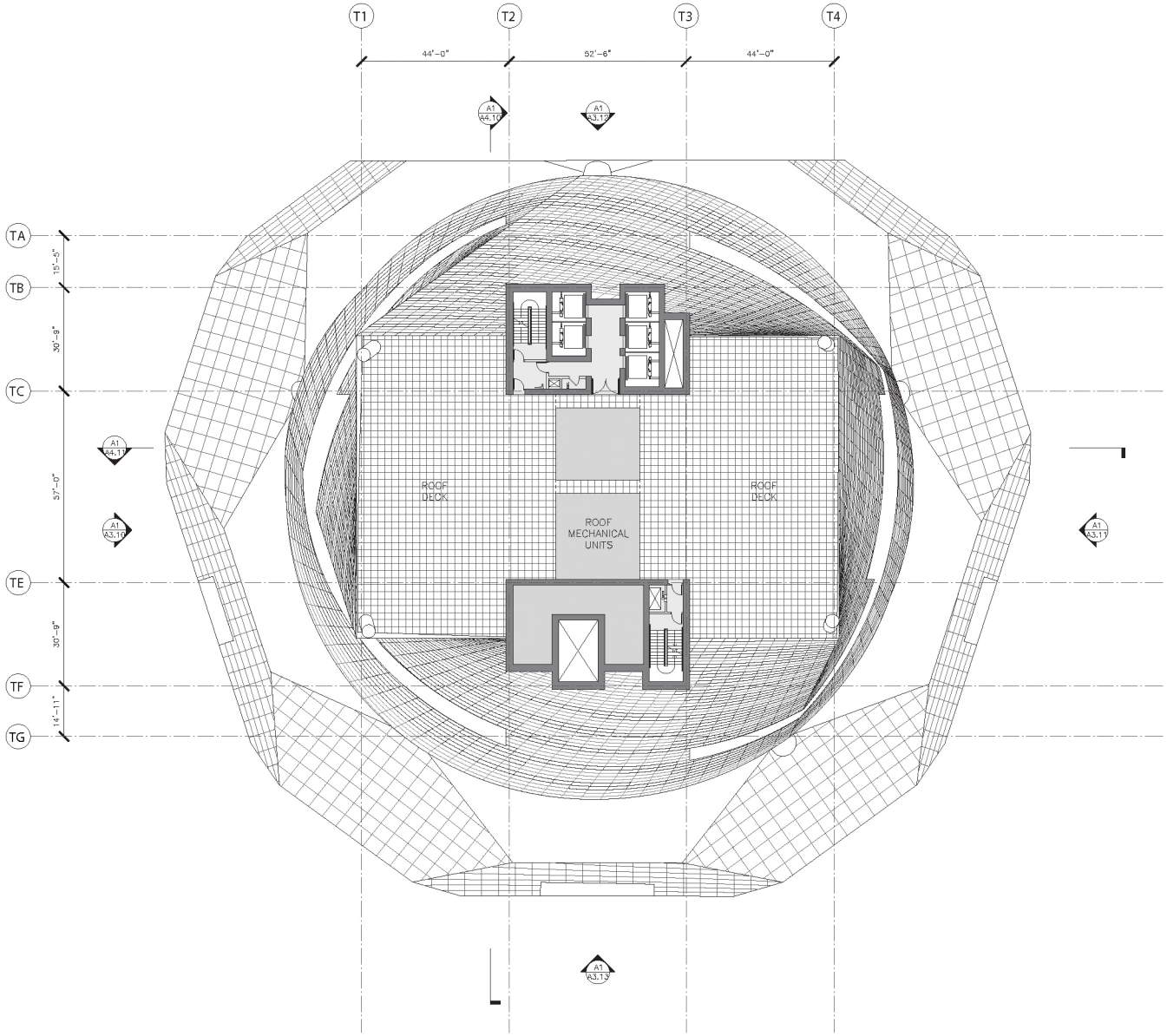
Figure 1-15
Levels 9-10

Source: Eric Owen Moss Architects, 08/22/2019.



Source: Eric Owen Moss Architects, 08/22/2019.

Figure 1-16
Typical Level (Levels 11-21)



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Scale (Feet)

Source: Eric Owen Moss Architects, 08/22/2019.

Figure 1-17
Level 22 (Roof)

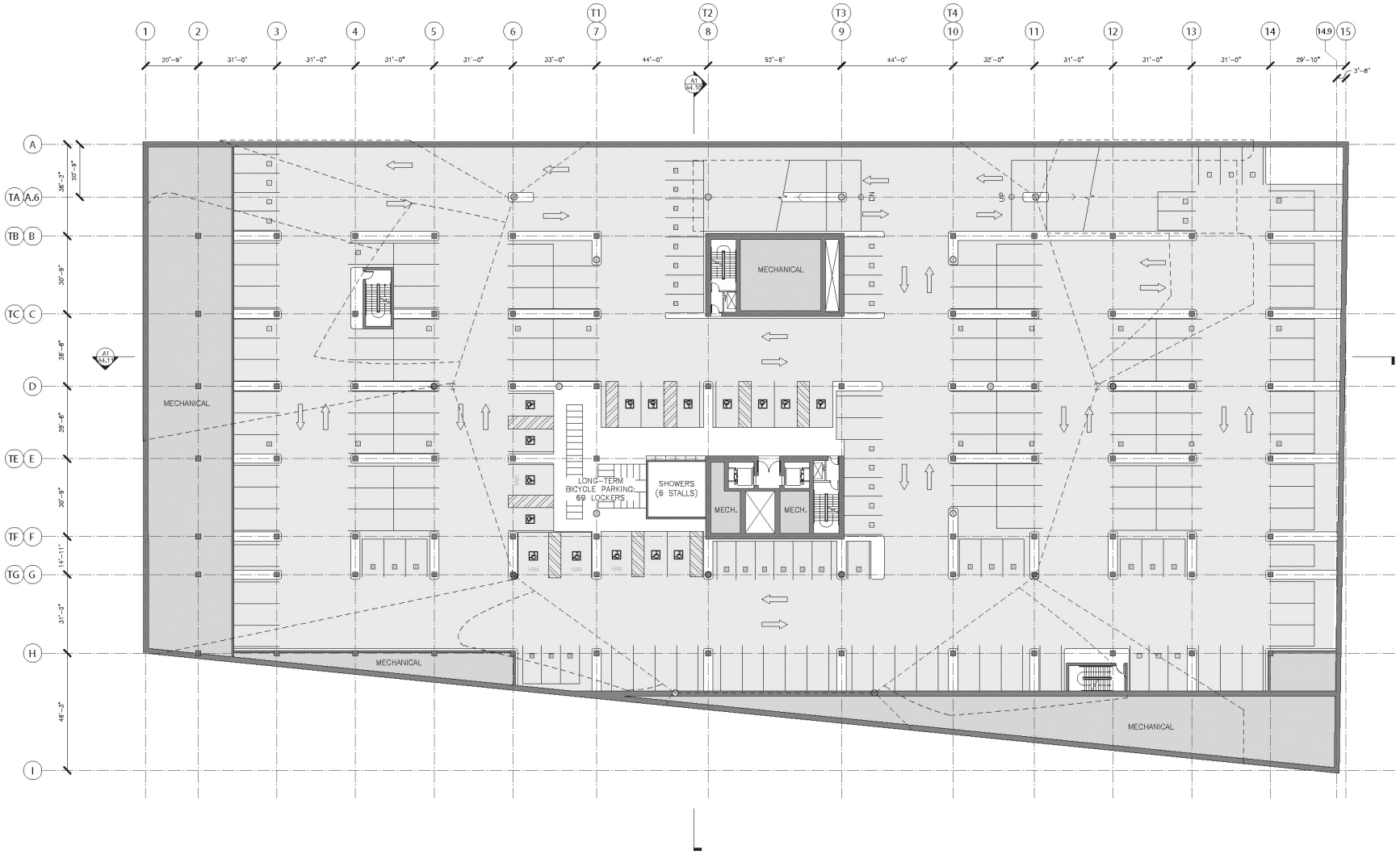
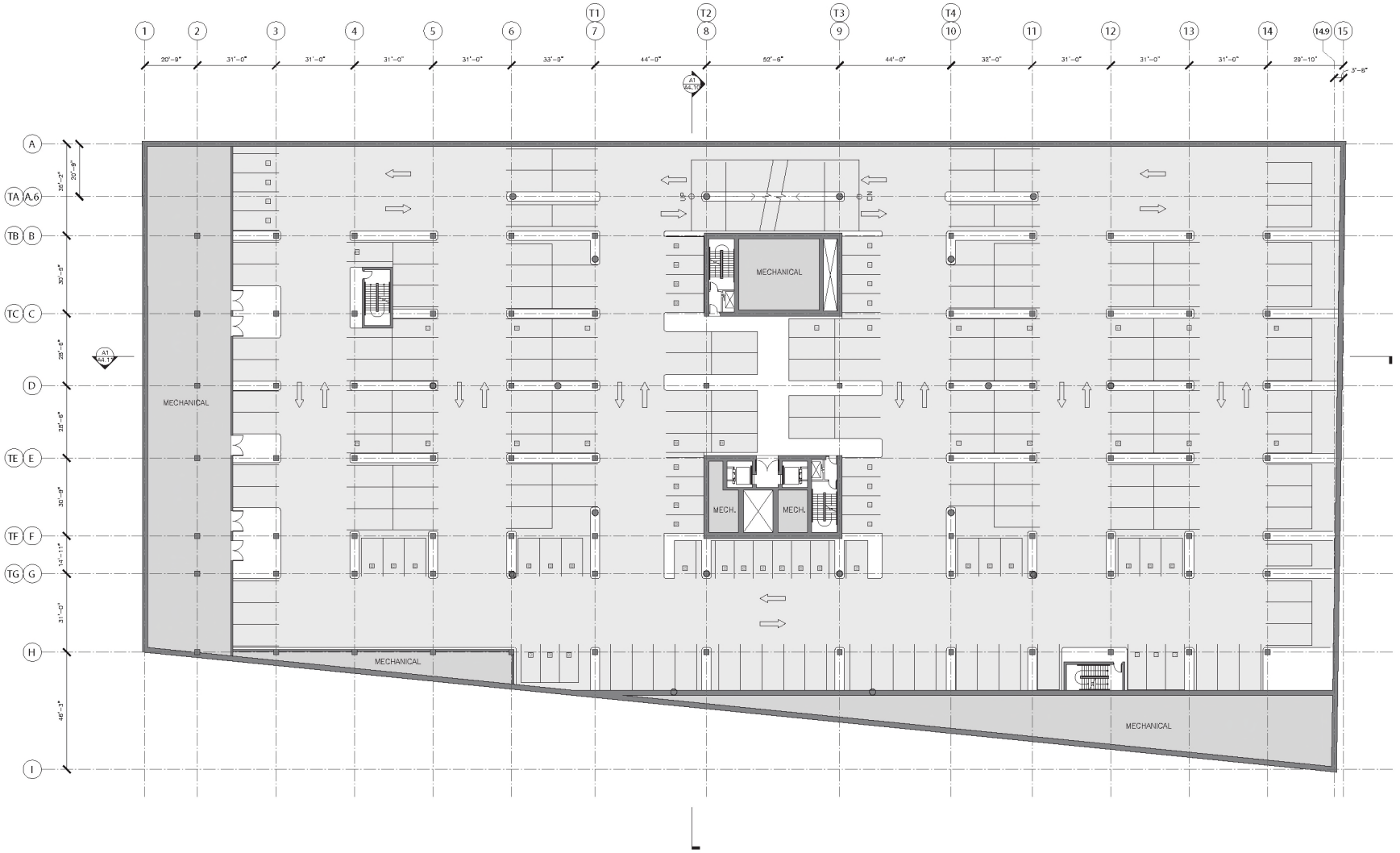


Figure 1-18
Basement 1

Source: Eric Owen Moss Architects, 08/22/2019.



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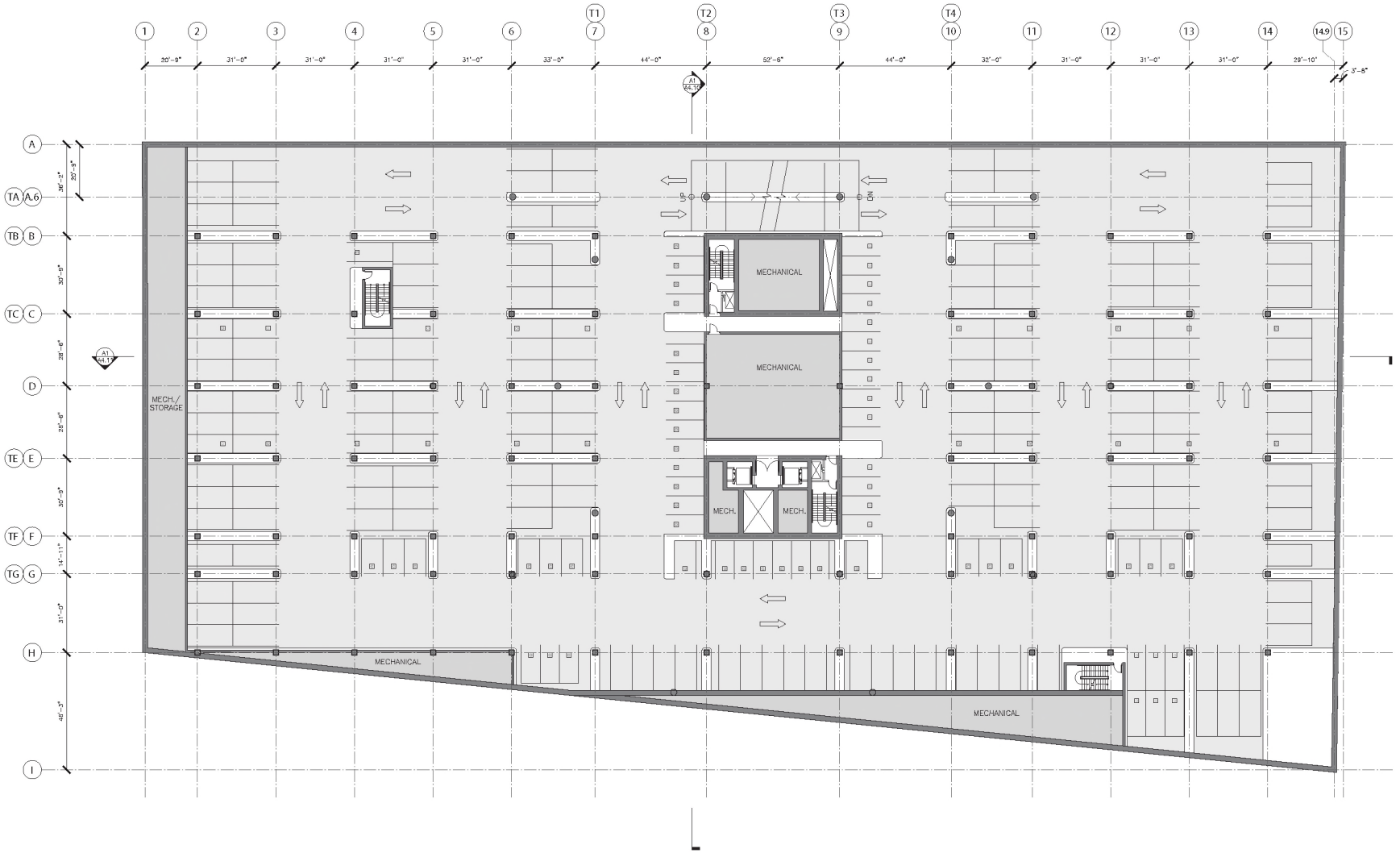
Scale (Feet)

Figure 1-19
Basement 2

Source: Eric Owen Moss Architects, 08/22/2019.



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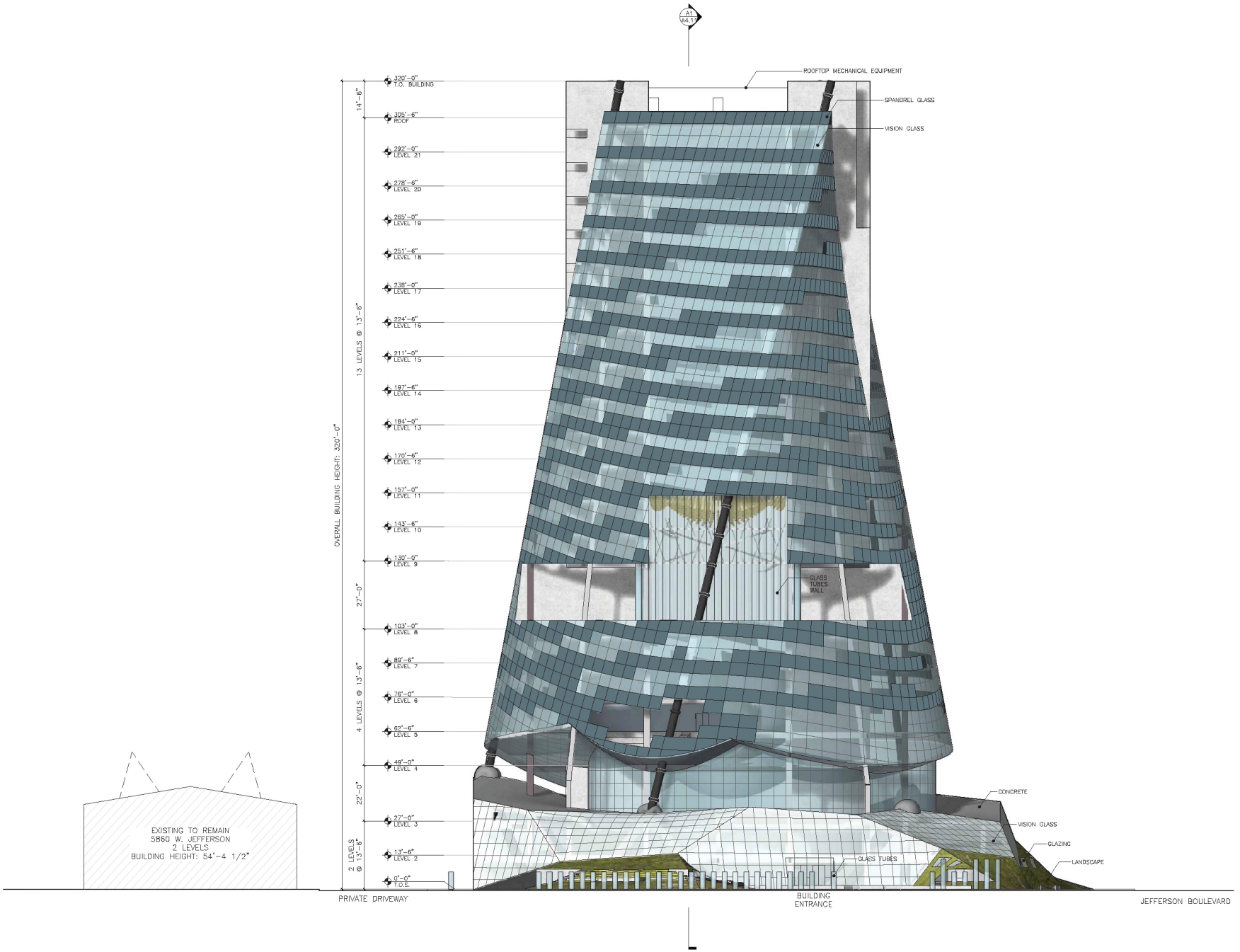
Scale (Feet)

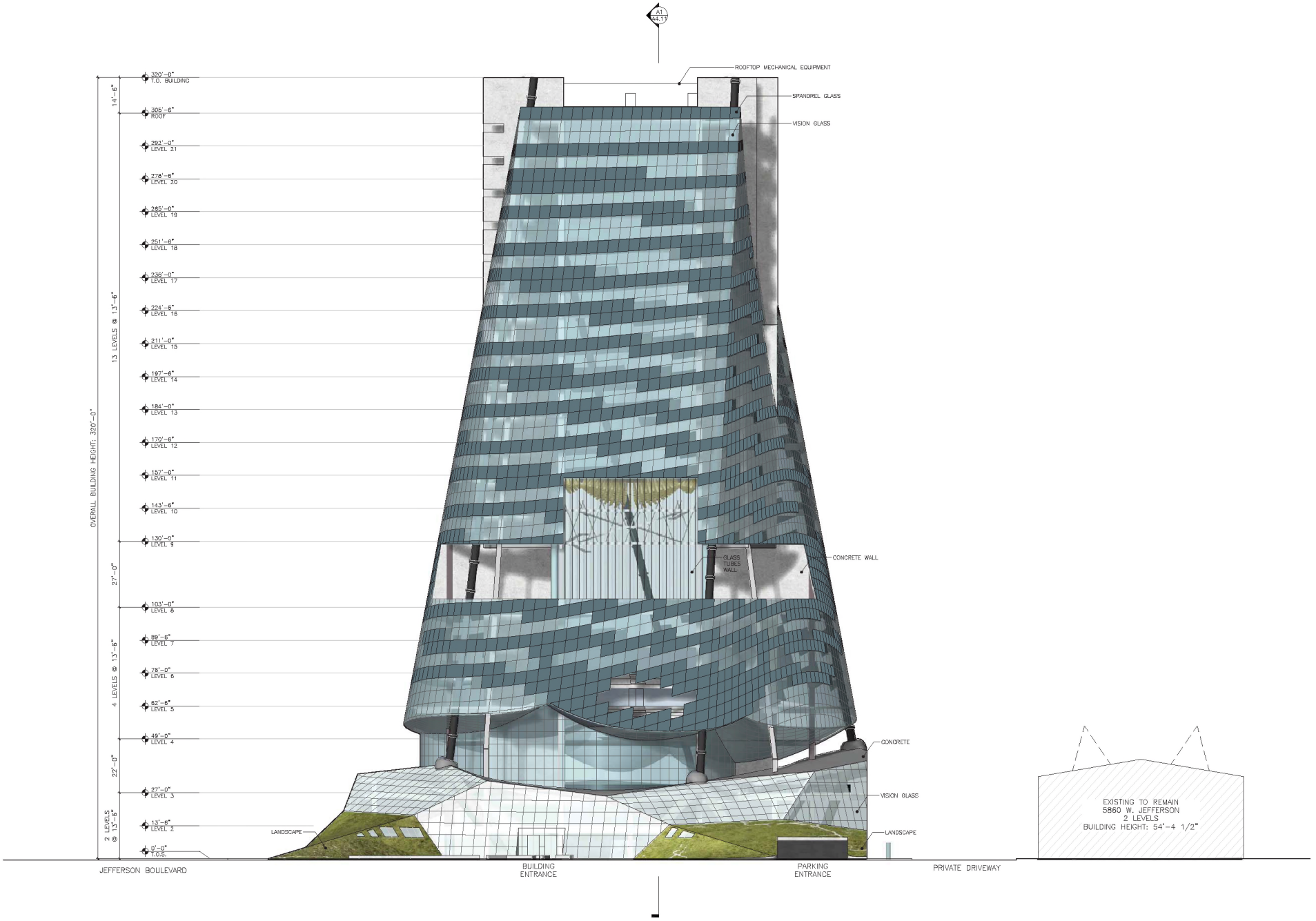
Source: Eric Owen Moss Architects, 08/22/2019.

Figure 1-20
Basement 3-4



Source: Eric Owen Moss Architects, 08/22/2019.

Figure 1-21
North Elevation



Source: Eric Owen Moss Architects, 08/22/2019.

Figure 1-22
South Elevation

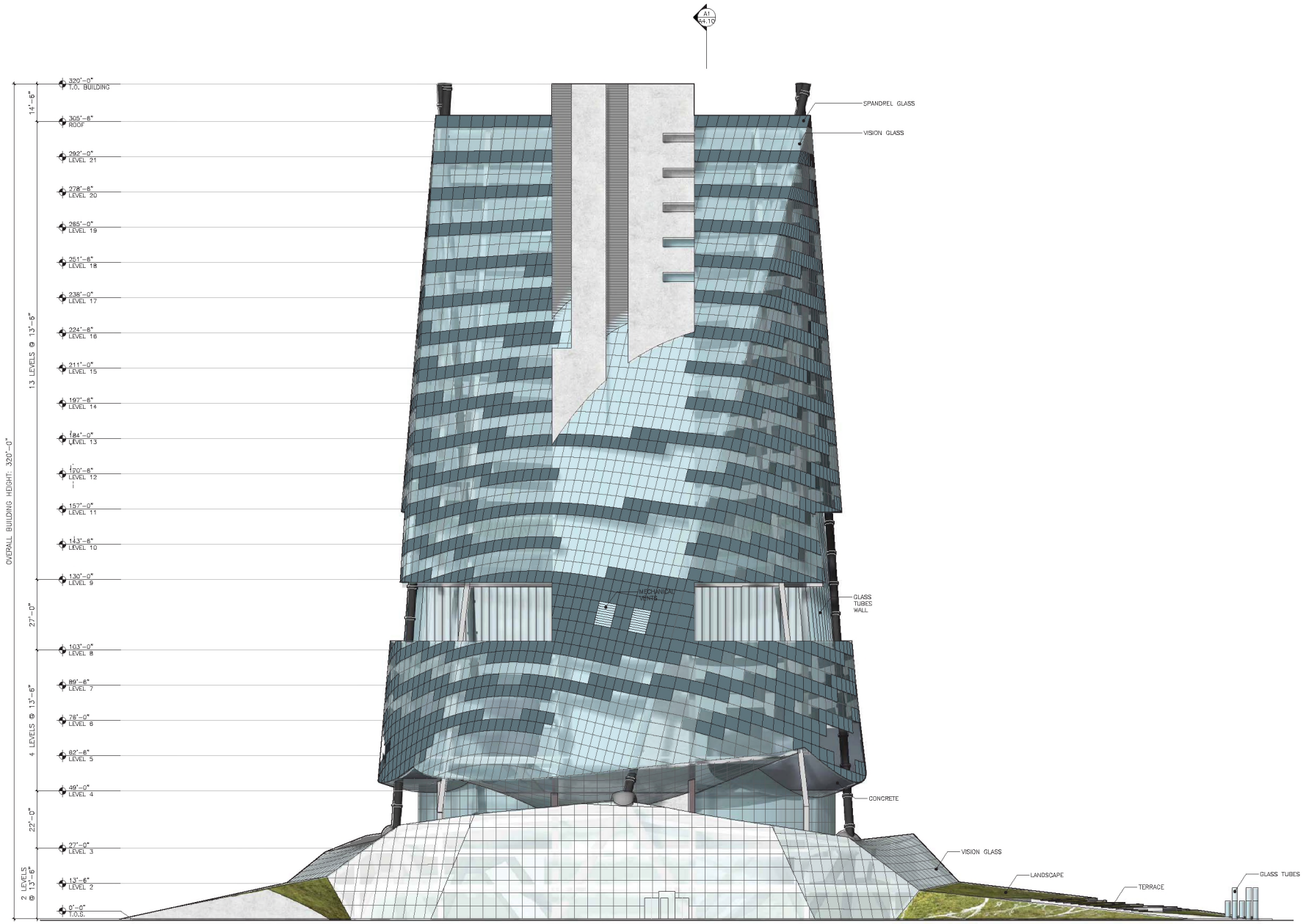
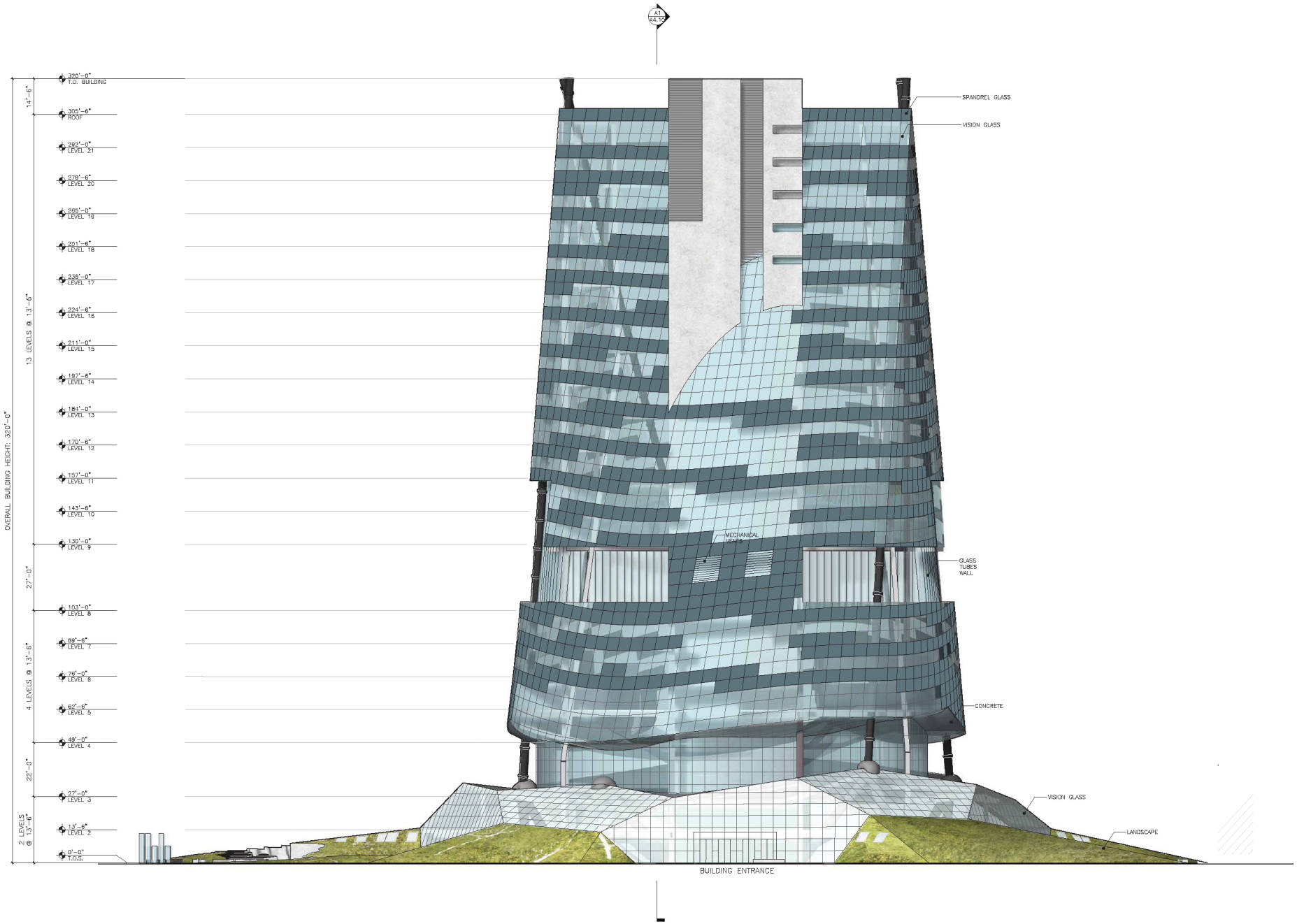


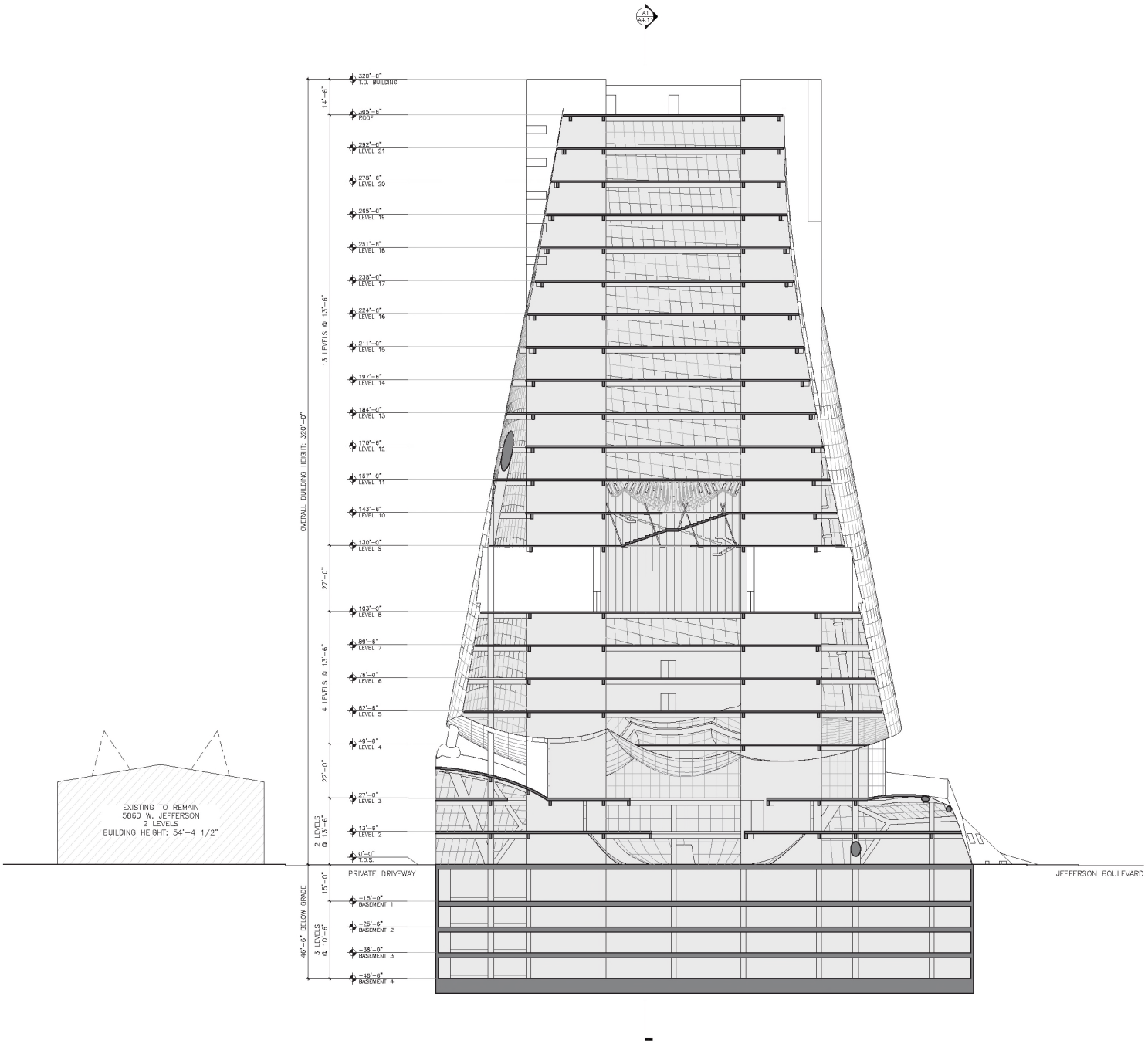
Figure 1-23
East Elevation

Source: Eric Owen Moss Architects, 08/22/2019.



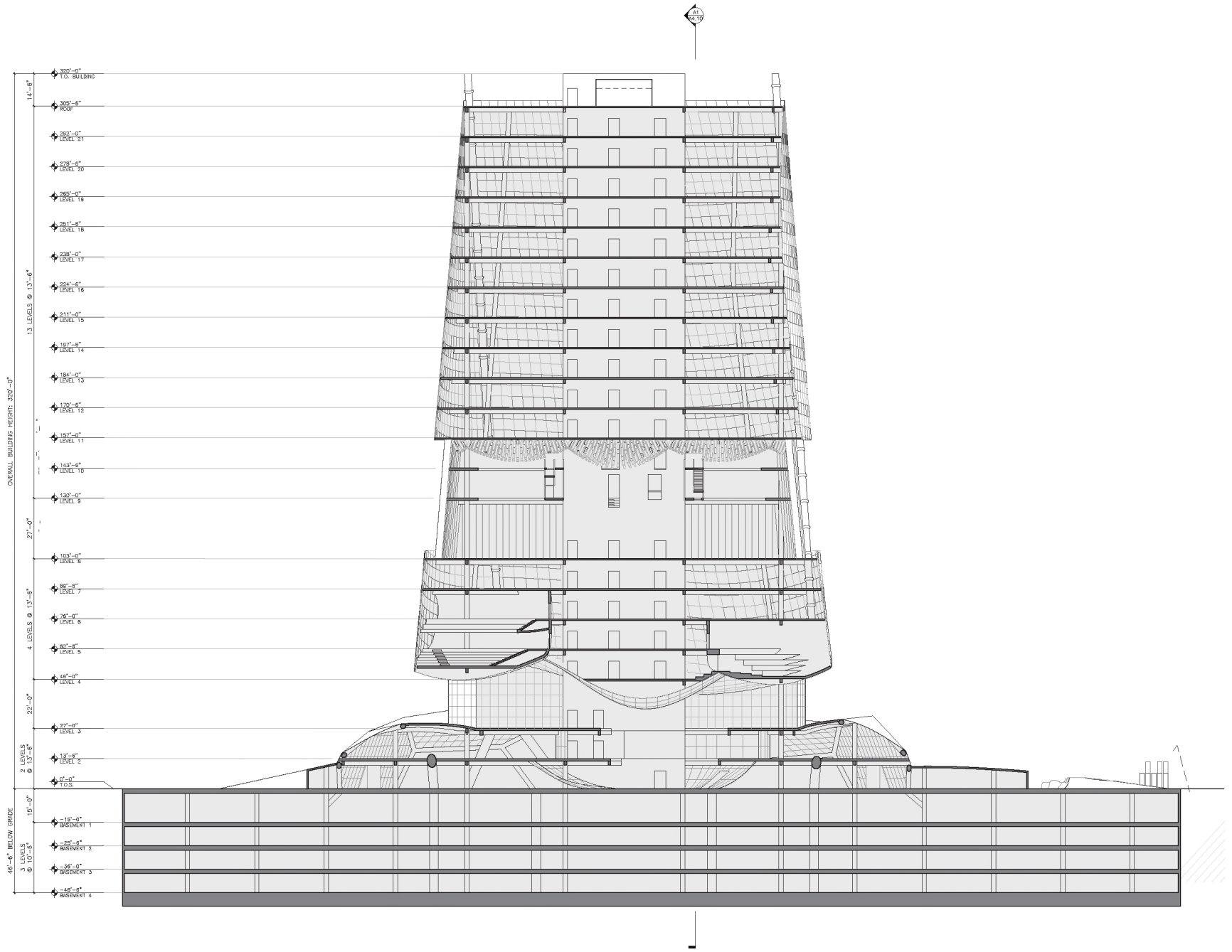
Source: Eric Owen Moss Architects, 08/22/2019.

Figure 1-24
West Elevation



Source: Eric Owen Moss Architects, 08/22/2019.

Figure 1-25
Section 1



Source: Eric Owen Moss Architects, 08/22/2019.

Figure 1-26
Section 2

Source: Eric Owen Moss Architects, 08/22/2019.

Figure 1-27
Conceptual View

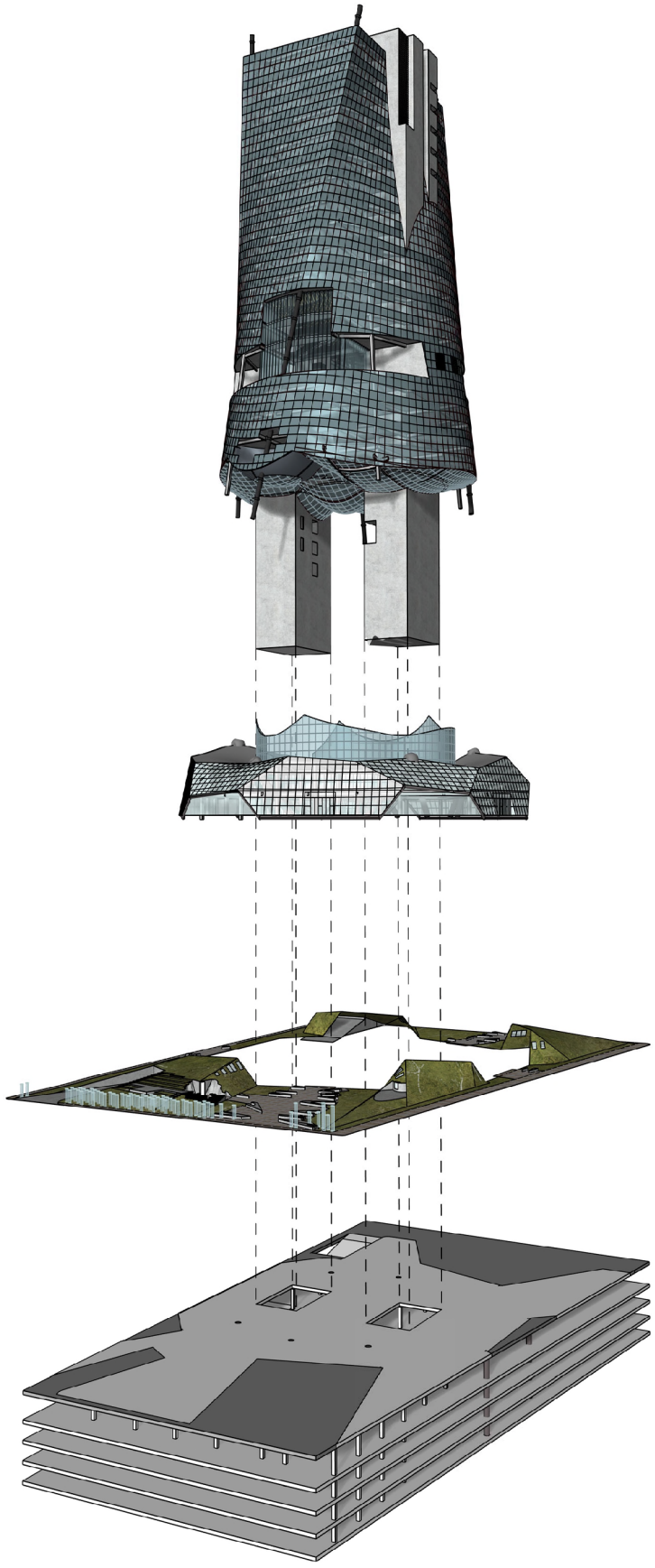
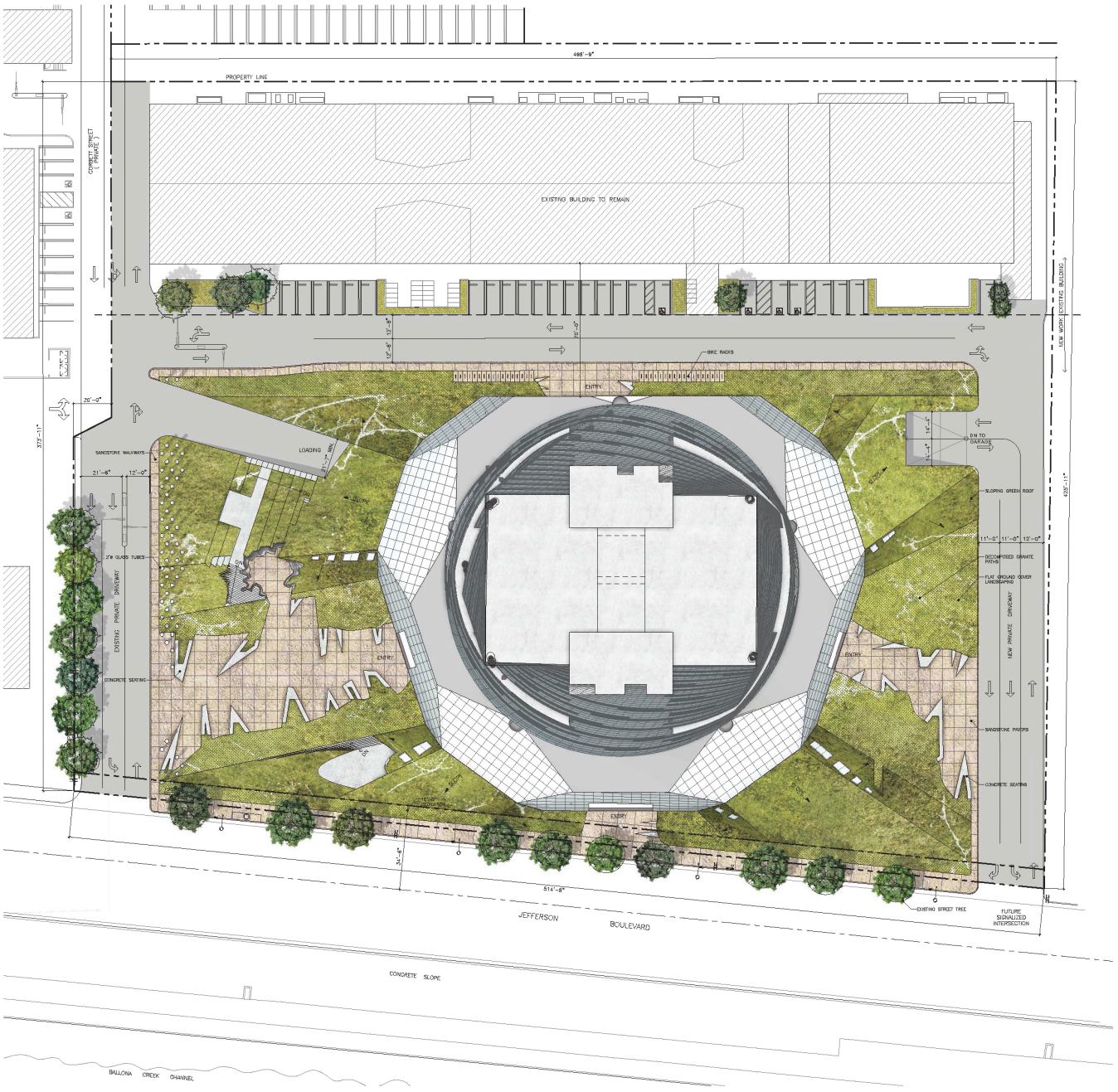


Figure 1-28
Four Project Components

Source: Eric Owen Moss Architects, 08/22/2019.



PLANT LIST

BOTANIC NAME	COMMON NAME	MATURE SIZE	NATIVE	WATER USE
EPILOBIUM CANUM	CALIFORNIA FUCHSIA	1'-2"H X 4'-5"W	YES	LOW
LANTANA MONTEVIDENISIS	PURPLE TRAILING LANTANA	1'-2"H X 8'-10"W		LOW
MYOPORUM PARVIFOLIUM 'PINK'	PINK AUSTRALIAN RACER	<1'H X 6'-12'W	YES	LOW
ERIOGONIUM FASCICULATUM 'THEODORE PAYNE'	SPREADING CALIFORNIA BUCKWHEAT	1'H X 3'W	YES	LOW
SANTOLINA VIRENS	GREEN LAVENDER COTTON	2'H X SAME		LOW
ARTEMISIA PSYCNOCEPHALA 'DAVID'S CHOICE'	DAVID'S CHOICE COASTAL SAGEWORT	1'-2"H X 2'-3'W	YES	LOW
AMBROSIA PUMILA	SAN DIEGO AMBROSIA	6"H X 2'-3'W	YES	VERY LOW
SESLERIA AUTUMNALIS	AUTUMN MOOR GRASS	1'-2'H X SAME		LOW
ESCHSCHOLZIA CALIFORNICA	CALIFORNIA POPPY	0.5'-1'H X SAME	YES	LOW
YUCCA PALLIDA	PALE LEAF YUCCA	1'-2'H X 2'-3'W	YES	LOW
MUHLENBERGIA PUBESCENS	SOFT MUHLY	1'-3'H X 2'-3'W		LOW
SALVIA CHAMAED-RYOIDES	GERMANDER SAGE	1'-2'H X 3'-4'W	YES	LOW
SENECIO VITALIS	BUSH BLUE PICKLE	1.5'H X 2'-3'W		LOW
NO MOW CUSTOM NATIVE SOD MIX	-	4"-18"H	YES	LOW TO MODERATE
BACCHARIS PILULARIS 'PIGEON POINT'	DWARF COYOTE BRUSH	1'-2'H X 8'-10'W	YES	LOW
EUPHORIA BREATHLESS 'BLUSH'	-	1'H X 2'W		LOW
PHYLA NODIFLORA L. 'KURAPIA'	KURAPIA	1'H X 6'W		LOW

LEGAL DESCRIPTION

PARCEL B OF PARCEL MAP NO. 3730, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP FILED IN BOOK 93, PAGES 24 AND 25 OF PARCEL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

EXCEPTING THEREFROM ONE-HALF OF THE MINERALS AND MINERAL ORES OF EVERY KIND AND CHARACTER NOW KNOWN TO EXIST OR HEREAFTER DISCOVERED UPON, WITHIN OR UNDERLYING SAID LAND, OR THAT MAY BE PRODUCED THEREFROM INCLUDING, WITHOUT LIMITING THE GENERALITY OF THE FOREGOING, ALL PETROLEUM OIL, NATURAL GAS AND OTHER HYDROCARBON SUBSTANCES AND PRODUCTS DERIVED THEREFROM, TOGETHER WITH THE EXCLUSIVE AND PERPETUAL RIGHT OF SAID CARNATION COMPANY, ITS SUCCESSORS AND ASSIGNS, OF INGRESS AND EGRESS BENEATH THE SURFACE OF SAID LAND TO EXPLORE FOR, EXTRACT, MINE AND REMOVE THE SAME AND TO MAKE SUCH USE OF SAID LAND BENEATH THE SURFACE AS IS NECESSARY OR USEFUL IN CONNECTION THEREWITH, WHICH USE MAY INCLUDE LATERAL OR SLANT DRILLING, BORING, DIGGING, OR SINKING OF WELLS SHAFTS OR TUNNELS; PROVIDED, HOWEVER, THAT SAID CARNATION COMPANY, ITS SUCCESSORS AND ASSIGNS, SHALL NOT USE THE SURFACE OF SAID LAND IN THE EXERCISE OF ANY OF SAID RIGHTS, AND PROVIDED FURTHER THAT ALL SUCH EXPLORATION AND EXTRACTION SHALL BE PERFORMED BENEATH A DEPTH OF 200 FEET FORM THE SURFACE OF SAID LAND, AS RESERVED BY CARNATION COMPANY, IN A DEED RECORDED NOVEMBER 1, 1971 AS INSTRUMENT NO. 178, OF OFFICIAL RECORDS.

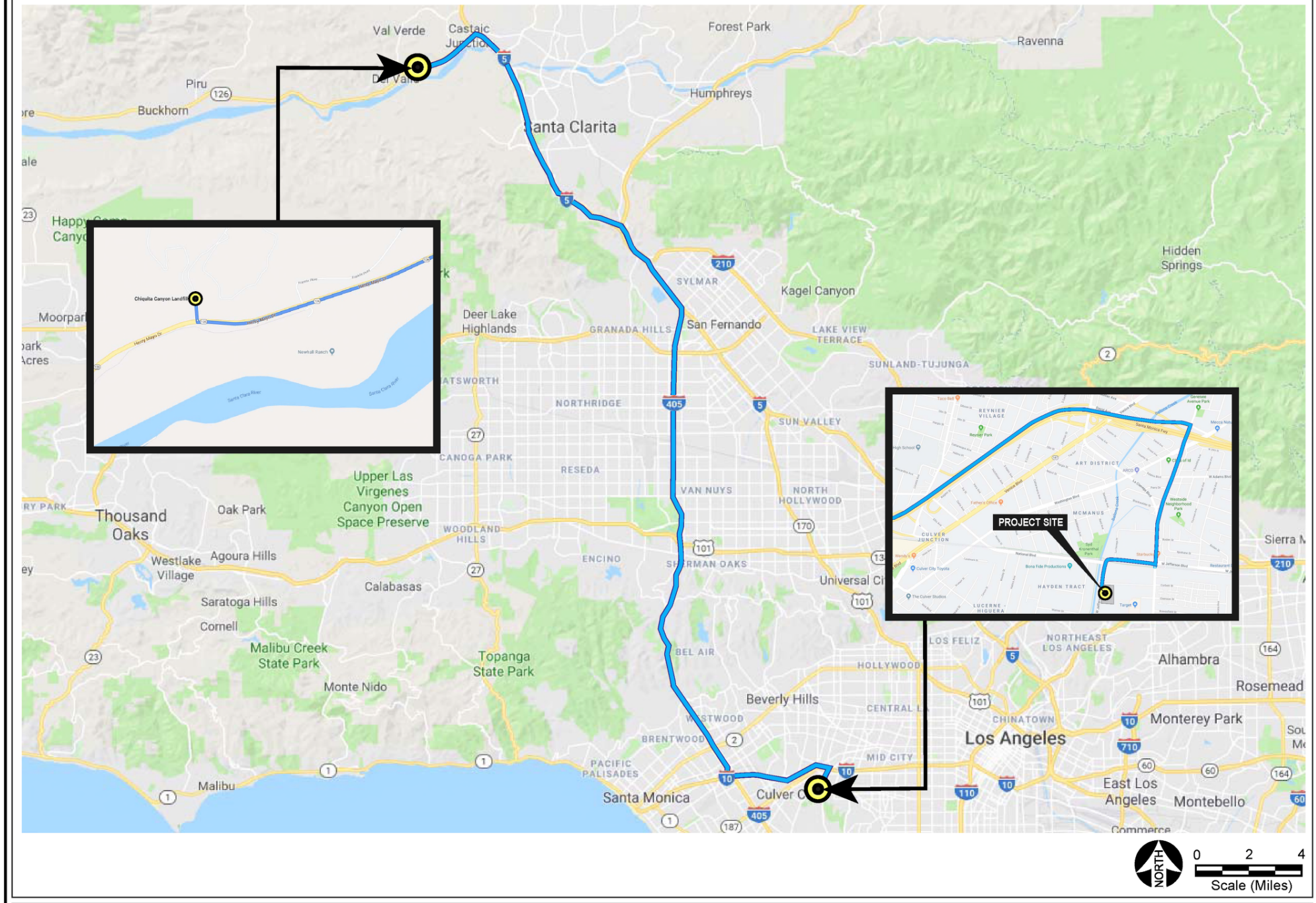
NORTH

0 20 40

Scale (Feet)

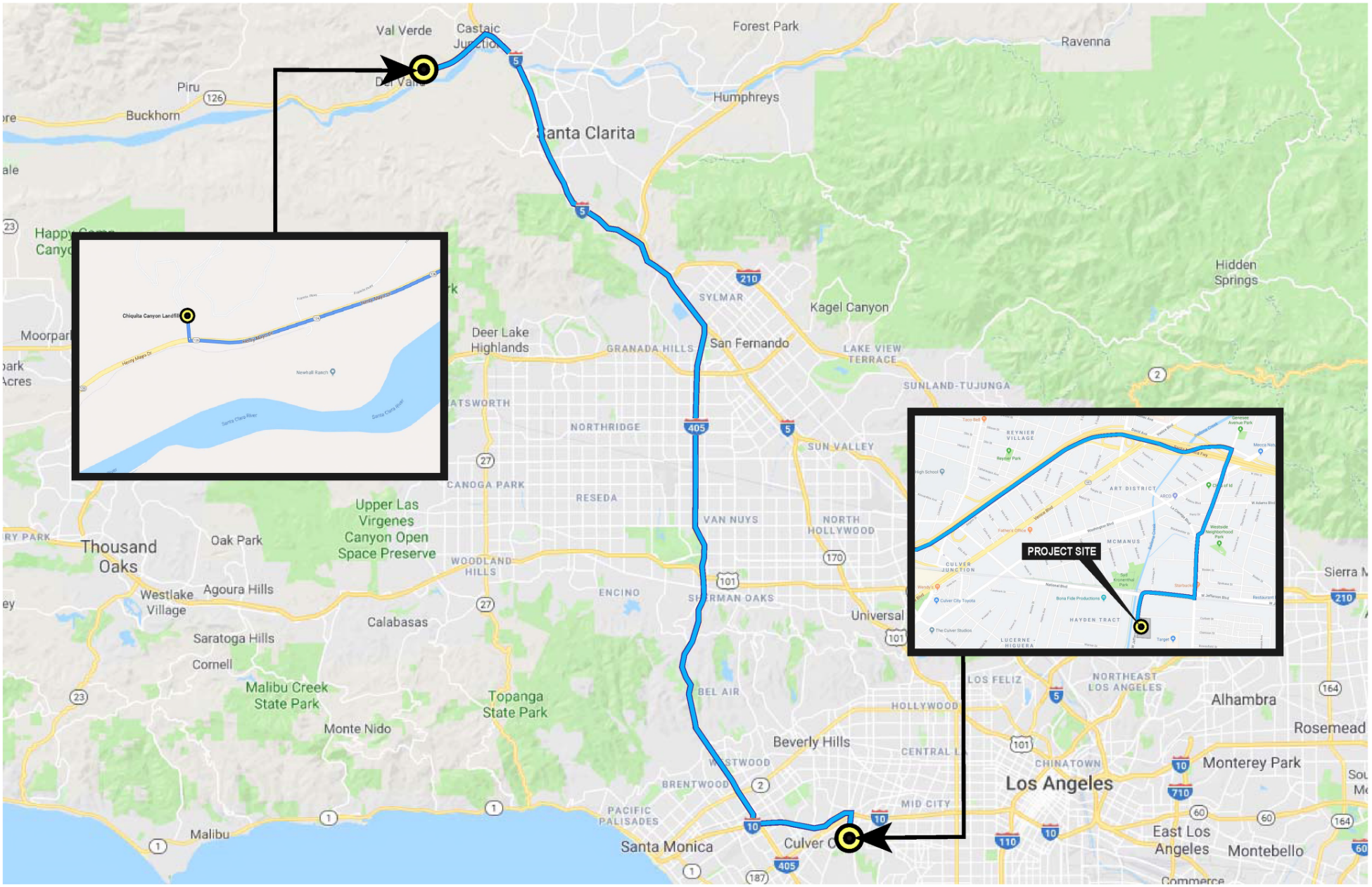
Source: Eric Owen Moss Architects, 08/22/2019.

Figure 1-29
Landscape Plan



Source: Google Maps, 2019.

Figure 1-30
Haul Route to Chiquita Canyon Landfill
29201 Henry Mayo Drive, Castaic CA 91384



Source: Google Maps, 2019.

Figure 1-31
Haul Route to Project Site
5850 W. Jefferson Boulevard, Los Angeles, CA 90016

2. Regulatory Framework

2.1 Addendum to an EIR and Negative Declaration

Section 15164 of the CEQA Guidelines provides the authority for preparing an addendum to a previously certified EIR or adopted negative declaration. Specifically, Section 15164 states the following:

(a) *The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*

(b) *An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.*

(c) *An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.*

(d) *The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.*

(e) *A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.*

2.2 Purpose of this Analysis

Because the proposed changes to the Approved Project do not meet the conditions described in Section 15162 of the CEQA Guidelines[4], the City determined that an Addendum to the previously adopted EIR is the appropriate documentation to address the proposed revisions.

The proper standard of review for addenda following an EIR approval is for substantial evidence.[5] CEQA Guidelines Section 15164 validly establishes an addendum process that is consistent with the CEQA statute.[6]

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[4] Changes to a project for which an EIR has been adopted can trigger the requirement for additional CEQA-related analysis. Section 15162 of the CEQA Guidelines describes the circumstances for when a subsequent EIR or negative declaration is required. The environmental impacts associated with the Approved Project were addressed in the previously adopted EIR. For the reasons discussed below, the proposed changes to the Approved Project would not result in any new significant impacts and would not increase the severity of the previously identified significant impacts. Thus, the proposed changes to the Approved Project do not constitute "substantial changes" that would require "major revisions" to the EIR due to new or increased impacts (refer to Section 15162 (a)(1)). Additionally, the "circumstances under which the project" would be undertaken are no different than described in the EIR (refer to Section 15162(a)(2)). Further, the proposed changes to the Project do not represent "new information of substantial importance" that would result in new or increased significant impacts not already identified in the EIR (refer to Section 15162(a)(3)). For these reasons, a subsequent EIR to address this new information is NOT required.

The environmental analysis presented below for the 5850 Project demonstrates that the proposed changes will not create new or increased significant environmental impacts beyond those already identified in the previously adopted EIR.

The Los Angeles Department of City Planning (Department) has prepared this analysis to determine whether the Addendum to the EIR is in accordance with CEQA and the California CEQA Guidelines.

Specifically, the scope of this analysis evaluates the 5850 Project to determine if it will 1) involve substantial changes that would result in new significant environmental effects or a substantial increase in the severity of significant effects previously identified in the Certified EIR; 2) involve substantial changes with respect to the circumstances under which the Project would be undertaken that would result in new significant environmental effects or the substantial increase in the severity of effects previously identified in the Certified EIR; or 3) involve new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified. This analysis supports use of the Addendum, which has been prepared in accordance with relevant provisions of the California Environmental Quality Act (CEQA) of 1970 (as amended) and the *State CEQA Guidelines*.

This analysis has determined that there are no new significant environmental effects and no substantial increase in the severity of previously identified significant effects. Furthermore, there are no known mitigation measures or alternatives that were previously considered infeasible but are now considered feasible that would substantially reduce one or more significant effects on the environment previously identified in the EIR. Therefore, neither a subsequent EIR nor a supplemental EIR, as defined under CEQA Guidelines Sections 15162 and 15163, respectively, is required. An Addendum to the adopted EIR, as permitted under Section 15164, is appropriate.

[5] Friends of the College of San Mateo Gardens v. San Mateo County Community College District (2017) 11 Cal. App.5th 596.

[6] Save Our Heritage Organisation v. City of San Diego (The Plaza de Panama Committee, Real Party in Interest) (2018) 28 Cal.App.5th 656.

3. Revisions to Appendix G of the CEQA Guidelines

3.1 Introduction

The California Natural Resources Agency adopted revisions to the CEQA Guidelines that became effective on December 28, 2018, which was adopted after preparation of the Certified EIR. The revisions to the CEQA Guidelines were adopted largely to create efficiencies and to align the CEQA Guidelines with California appellate court and Supreme Court decisions. The revisions that are most applicable to the EIR are those associated with changes to Appendix G.

Appendix G of the CEQA Guidelines contains a sample initial study format. The purpose of an initial study is to assist lead agencies in determining whether a project may cause a significant impact on the environment. To help guide that determination, Appendix G asks a series of questions in the form of a checklist regarding a range of environmental resources and potential impacts. The City uses Appendix G in their EIRs to demonstrate that a project would not result in significant impacts on the environment that cannot be mitigated.

When the Appendix G checklist was originally developed, it contained only a handful of questions. Over time, the list of questions has grown in response to increasing awareness of the effects of development on the environment. Currently, the sample checklist contains 89 questions divided into 20 categories of potential impacts.

3.2 Modifications to Appendix G of the CEQA Guidelines

The revisions to Appendix G were adopted largely to reduce redundancy, provide additional clarity, and to align Appendix G with California appellate court and Supreme Court decisions and changes to the Public Resources Code. An overview of the modifications to the Appendix G is provided below by environmental topic. Based on the discussion below, while Appendix G was modified, the modified Appendix G questions that would apply to the 5850 Project have been addressed within the Certified EIR.

3.2.1 Aesthetics

Consistent with SB 743, the modifications clarify that the checklist questions regarding aesthetics do not apply to projects that are located in a transit priority area and are defined as set forth in PRC Section 21099. Per SB 743, aesthetic impacts for such projects are less than significant. For those projects that do not meet the definition provided in PRC Section 21099, the modifications provide distinct checklist questions for public views and consistency with zoning regulations governing scenic views, depending upon whether the project is within a non-urbanized or urbanized area. All of the checklist questions as presented in the updated Appendix G checklist are addressed in Section 4.1, Aesthetics, of the Draft EIR. Further, as discussed below, the 5850 Project meets the definition of PRC 21099 and as such, aesthetic impacts associated with the 5850 Project are less than significant.

3.2.2 Agriculture and Forestry Resources

These checklist questions were not updated as part of the modifications and are responded to in the Section 4.2, Agriculture and Forestry Resources, of the Draft EIR.

3.2.3 Air Quality

These checklist questions were modified to delete Checklist Question III.b regarding violation of air quality standards and to modify the question regarding odors. All of the checklist questions as presented in the updated Appendix G checklist are addressed in Section 4.3, Air Quality, of the Draft EIR.

3.2.4 Biological Resources

Checklist Question IV.c has been modified to remove the reference to Section 404 of the Clean Water Act. This modification does not affect the analysis of biological resources provided in Section 4.4, Biological Resources, of the Draft EIR.

3.2.5 Cultural Resources

These modifications consist of a minor word change to Checklist Question V.a and moving Checklist Question V.c from the cultural resources subsection to the geology subsection of Appendix G. Impacts to cultural resources are addressed in Section 4.5, Cultural Resources, of the Draft EIR.

3.2.6 Energy

The modifications include creating a separate subsection for energy, and also incorporating language from Appendix F of the CEQA Guidelines. These added checklist questions have already been addressed in Section 4.16, Utilities and Service Systems, of the Draft EIR.

3.2.7 Geology and Soils

These checklist questions have been modified to focus on both the direct and indirect impacts associated with geology and soils and to move the analysis of paleontological resources to this topic (from the cultural resources section). Impacts to geology and soils are fully addressed in Section 4.6, Geology and Soils, of the Draft EIR. Further, impacts with respect to paleontological resources are addressed in Section 4.5, Cultural Resources, of the Draft EIR.

3.2.8 Greenhouse Gas Emissions

These checklist questions were not changed as part of the modifications and are addressed in Section 4.7, Greenhouse Gas Emissions, of the Draft EIR.

3.2.9 Hazards and Hazardous Materials

These checklist questions were revised to delete Checklist Question VIII.f regarding safety hazards associated with proximity to a private airstrip and to clarify that Checklist Question VIII.g (formerly Checklist Question VIII.h) includes both direct or indirect impacts associated with wildland fires. All of the checklist questions as presented in the updated Appendix G checklist are addressed in Section 4.8, Hazards and Hazardous Materials, of the Draft EIR.

3.2.10 Hydrology and Water Quality

These checklist questions were revised to provide clarification and eliminate redundancy. All of the topics in these checklist questions, including those related to water quality, groundwater, flooding, and flood hazards, are thoroughly addressed in Section 4.9, Hydrology and Water Quality, of the Draft EIR.

3.2.11 Land Use and Planning

Checklist Question X.b has been revised to focus on conflicts with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Checklist Question X.c has been deleted, as it addressed habitat conservation plans, which are already addressed under the biological resources checklist questions. An analysis of the Project's consistency with land use plans, policies, and regulations is provided in Section 4.10, Land Use and Planning, of the Draft EIR.

3.2.12 Mineral Resources

These questions were not updated as part of the modifications and are responded to in Section 4.11, Mineral Resources, of the Draft EIR.

3.2.13 Noise

Checklist Questions XII.a and XII.b were revised to focus on impacts associated with the generation of noise and vibration noise levels. In addition, Checklist Questions XII.c, XII.d, and XII.f were deleted, as they were redundant, and Checklist Question XII.e was revised accordingly. The topics associated with these modified questions are fully addressed in Section 4.12, Noise, of the Draft EIR.

3.2.14 Population and Housing

Checklist Question XIII.a was clarified to focus on potential impacts associated with unplanned growth, and Checklist Questions XIII.b and XIII.c were combined. The topics in these modified questions are fully addressed in Section 4.13, Population, Housing, and Employment, of the Draft EIR.

3.2.15 Public Services

These checklist questions were not updated as part of the modifications and are responded to in Sections 4.14, Public Services, of the Draft EIR.

3.2.16 Recreation

These questions were not updated as part of the modifications and are responded to in Section 4.14, Pubic Services, of the Draft EIR.

3.2.17 Transportation

Checklist Questions XVI.a and XVI.f were combined and clarified to focus on conflicts with a program, plan, ordinance, or policy addressing the circulation system. Checklist Question XVI.c regarding airport traffic safety was eliminated, as airport traffic safety is already addressed under the hazards questions. Former Checklist Question XVI.d (now Checklist Question XVI.c) was revised to add "geometric" for clarity. All of the topics in these questions were addressed in Section 4.15, Transportation and Traffic, of the Draft EIR.

In addition, Checklist Question XVI.b was revised to address consistency with CEQA Guidelines Section 15064.3, subdivision (b), which relates to use of vehicle miles traveled (VMT) as the methodology for evaluating traffic impacts. The City adopted a VMT methodology on July 30, 2019. The traffic analysis prepared for the 5850 Project, and included herein, has therefore been prepared using the City's adopted VMT methodology.

3.2.18 Tribal Cultural Resources

Assembly Bill (AB) 52 went into effect on July 1, 2015, and requires that for a project for which a Notice of Preparation (NOP) for a Draft EIR was filed on or after July 1, 2015, the lead agency is required to consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of a proposed project, if: (1) the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area; and (2) the tribe requests consultation, prior to the release of a negative declaration, mitigated negative declaration or environmental impact report for a project. The NOP for the West Adams New Community Plan EIR was released on February 1, 2008, and therefore, the lead agency was not required to comply with the requirements of AB 52. AB 52 also required an update to Appendix G of the CEQA Guidelines to include questions related to impacts to tribal cultural resources. Changes to Appendix G were approved by the Office of Administrative Law on September 27, 2016. The Final EIR was released in May of 2016, and therefore did not include responses to the updated Appendix G questions related to tribal cultural resources. Nevertheless, the issues related to tribal cultural resources were addressed within Section 4.5, Cultural Resources, of the Draft EIR.

3.2.19 Utilities and Service Systems

These checklist questions were revised to reduce redundancy. Specifically, Checklist Question XVIII.a was eliminated, as wastewater treatment was already addressed in former Checklist Question XVIII.e (now Checklist Question XVIII.c). In addition, former Checklist Questions XVIII.b and XVIII.c were combined to address all infrastructure types in one question (now Checklist Question XVIII.a) and to include the addition of telecommunications. Former Checklist

Question XVIII.d regarding water supply was also updated to clarify that the analysis of water supply should include reasonably foreseeable future development during normal, dry and multiple dry years. Former Checklist Questions XVIII.f and XVIII.g regarding solid waste impacts were also clarified.

3.2.20 Wildfire

New Checklist Question XX. Wildfire pertains to projects that are located in, or near, state responsibility areas or lands classified as very high fire hazard severity zones. The Project Site is not located in or near state responsibility areas, nor is the Project Site located in a City-designated Very High Fire Hazard Severity Zone. Therefore, these questions are not applicable to the 5850 Project.

4. Environmental Impact Analysis

The information below addresses each of the environmental issues that were previously analyzed within the scope of the previously certified EIR and the recently revised Appendix G of the CEQA Guidelines. The conclusions of the Certified EIR are provided as a reference for each environmental issue area for purpose of describing how the proposed changes would not result in any new significant impacts and would not increase the severity of the significant impacts identified in the Certified EIR.

A Modified Environmental Checklist Form was used to compare the anticipated environmental effects of the 5850 Project with those disclosed in the Certified EIR and to review whether any of the conditions set forth in Public Resources Code, Section 21166 or CEQA Guidelines, Section 15162, requiring preparation of a subsequent or supplemental EIR, have been triggered. This analysis provides the following information as to each of the impact thresholds analyzed in each of the impact categories:

Impact Determination in the EIR. This column sets forth the impact determination made in the Certified EIR for each impact threshold.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts? Pursuant to Section 15162(a)(1) of the CEQA Guidelines, this column indicates whether the changes represented by the current project (the 5850 Project) will result in new significant impacts that have not already been considered and mitigated by the prior environmental review or a substantial increase in the severity of a previously identified impact.

Any New Circumstances Involving New Impacts or Substantially More Severe Impacts? Pursuant to Section 15162(a)(2) of the CEQA Guidelines, this column indicates whether there have been changes to the project site or the vicinity (circumstances under which the project is undertaken) which have occurred subsequent to the prior environmental documents, which would result in the current project having new significant environmental impacts that were not considered in the prior environmental documents or that substantially increase the severity of a previously identified impact.

Any New Information Requiring New Analysis or Verification? Pursuant to Section 15162(a)(3)(A-D) of the CEQA Guidelines, this column indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental documents were certified as complete is available requiring an update to the analysis of the previous environmental documents to verify that the environmental conclusions and mitigations remain valid. If the new information shows that: (A) the project will have one or more significant effects not discussed in the prior environmental documents; or (B) that significant effects previously examined will be substantially more severe than shown in the prior environmental documents; or (C) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or (D) that mitigation measures or alternatives which are considerably different from those analyzed in the prior

environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative, then the question would be answered 'Yes' requiring the preparation of a subsequent or supplemental EIR. However, if the additional analysis completed as part of this environmental review finds that the conclusions of the prior environmental documents remain the same and no new significant impacts are identified, or identified environmental impacts are not found to be more severe, or additional mitigation is not necessary, then the question would be answered 'No' and no additional environmental documentation (supplemental or subsequent EIR) is required. New studies completed as part of this environmental review are attached to this Addendum, or are on file with the Planning Department.

Mitigation Measures Addressing Impacts. Pursuant to Section 15162(a)(3) of the CEQA Guidelines, this column indicates whether the prior environmental document provides mitigation measures to address effects in the related impact category. In some cases, the mitigations have already been implemented. A "yes" response will be provided in either instance. If "No" is indicated, this environmental review concludes that the impact does not occur with this project and therefore no mitigations are needed.

DISCUSSION AND MITIGATION SECTIONS. A discussion of the elements of the checklist is provided under each environmental category in order to clarify the answers. The discussion provides information about the particular environmental issue, how the project relates to the issue and the status of any mitigation that may be required or that has already been implemented. Applicable mitigation measures from the prior environmental review that apply to the project are listed under each environmental category.

Conclusions. A discussion of the conclusion relating to the analysis contained in each section.

4.1 Aesthetics

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
AESTHETICS: Except as provided in Public Resources Code Section 21099, would the project:					
(a) Have a substantial adverse effect on a scenic vista?	Less Than Significant	No	No	No	No
(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Less Than Significant	No	No	No	No
(c) In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less Than Significant with Mitigation	No	No	No	No
(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Significant and Unavoidable	No	No	No	Yes

In 2013, Governor Edmund G. "Jerry" Brown signed SB 743. Among other things, SB 743 adds PRC Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." PRC Section 21099 defines a "transit priority area" as an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations," and an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site

adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File No. 2452 provides further instruction concerning the definition of transit priority projects and that "[v]isual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the [L.A. CEQA Thresholds Guide] shall not be considered an impact for infill projects within TPAs pursuant to CEQA."

The Project Site is an infill site within the West Adams community that is zoned for commercial uses. The 5850 Project would construct a 22-story building with approximately 344,947 square feet of office uses. Coupled with the floor area of the existing building to remain on the Project Site (49,877 square feet), the Project would result in a floor area ratio of 2:1 across the Project Site. The Project Site has convenient access to public transportation and is served by numerous bus lines as well as the Metro Expo Light Rail Transit Line, with a station at the intersection of La Cienega and Jefferson Boulevards, approximately 1,100 feet northeast of the Project Site. Therefore, the 5850 Project is located in a transit priority area, as confirmed by the City of Los Angeles Zoning Information and Map Access System (ZIMAS).[7] As such, the 5850 Project qualifies as an employment center project located in a transit priority area, and its aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. The following analysis regarding scenic vistas, scenic resources, consistency with applicable regulations governing scenic quality, shade/shadow, and light and glare is provided for informational purposes only, and not for determining whether the 5850 Project will result in significant impacts to the environment.[8]

4.1.1 Impact Determination in the EIR

The Certified EIR stated that implementation of the Community Plan would not structurally change land use patterns nor result in a drastic change in the existing visual character of the West Adams CPA. However, the Community Plan increased the existing height/floor area ratios in some areas, resulting in a change in visual character. Mitigation Measure AE1 would ensure that these aspects of neighborhood character are maintained by implementing transitional height policies. The Certified EIR stated that the Community Plan would not impact any identified scenic vistas or recognized views and is geared toward maintaining consistent neighborhood character, encouraging adaptive reuse and rehabilitation, improving business and employment opportunities, and preserving existing retail and neighborhood services. Therefore, the Certified EIR determined that implementation of the Community Plan would result in less than significant impacts related to views, vistas, and scenic resources.

The Certified EIR also stated that the West Adams CPIO and Crenshaw Corridor Specific Plan could potentially increase the amount of glare in the West Adams CPA due to the intensification

[7] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 5860 Jefferson, www.zimas.lacity.org, accessed September 13, 2019.

[8] While not a specific environmental topic under Appendix G this analysis includes an evaluation of shading for informational purposes only in the light and glare section as it is related to light and the City has identified criteria for its analysis.

of residential and commercial development. Implementation of Mitigation Measures AE2 and AE3 would reduce impacts from light and glare. The Certified EIR stated that future development in the CPIO subdistricts and Specific Plan area could cause shadow impacts. Mitigation Measure AE1 would reduce impacts related to shade and shadow. However, shade and shadow effects during the months of December and January could still result in a significant impact. Therefore, the Certified EIR determined that implementation of the Community Plan would result in a significant and unavoidable impact related to shade and shadow.

Mitigation Measures

The following mitigation measures were included in the Certified EIR to reduce impacts related to aesthetics:

AE1[9] Any approval of a Discretionary project or *"Active Change Area Project",* with new construction located on commercial or industrially planned land in CPIO subareas or the Crenshaw Corridor Specific Plan that directly abuts or is across an alley from residentially planned land must transition in the following manner:

- Where the rear or side property line is contiguous with that of a residential lot or separated by an alley, the building shall be set back or "stepped back" one foot for every one foot in height as measured fifteen feet above grade at the shared/residential property line, or as specified through the individual CPIO subarea or Specific Plan ordinances when more restrictive.

- New construction located opposite the front yard setback of residentially planned land along local streets shall not exceed 30 feet in height for the first 50 feet of lot depth as measured from the commercial or industrial property line opposite the residential lot.

- Adjustments and Exceptions (permitted): The fifteen foot "step back" height limitation at the residential property line may be increased by not more than 20 percent or as specified through the CPIO or Specific Plan regulations when more restrictive through adjustment, otherwise, through the exception procedures pursuant to the Los Angeles Municipal Code.

AE2 Any approval of a Discretionary project or *"Active Change Area Project",* shall ensure that all lighting be directed and/or shielded to minimize lighting spillover effects onto adjacent and nearby properties.

AE3 Any approval of a Discretionary project or *"Active Change Area Project",* shall ensure that glare effects be limited by using non-reflective building and construction materials, such as concrete, wood, and stucco. This shall include, but not be limited to, art installations, fencing material, and recreational equipment.

[9] As discussed below, Mitigation Measure AE1 from the Certified EIR would not be applicable to the 5850 Project.

4.1.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The following analysis is provided for informational purposes only.

As discussed above, the 5850 Project includes among other things, a request to amend the West Adams CPIO for Parcel E only (shown in Figure 1-3), to allow a maximum building height of 320 feet and individual floor height up to 37 feet with atrium space up to 52 feet in height.[10] Therefore, the height of a building constructed on the Project Site would be increased when compared to the analysis contained in the Certified EIR (the current building height is limited to a maximum height of 75 feet). Therefore, the 5850 Project would increase the building height on the Project Site when compared to existing conditions and when compared to the currently allowed maximum building height, although the allowable floor area would not change.

Scenic Vistas

With respect to scenic vistas, the Baldwin Hills Scenic Overlook is located approximately one mile from the Project Site and provides a panoramic view of the Los Angeles Basin, the Pacific Ocean, and surrounding mountains. The 5850 Project would be viewable from the Baldwin Hills Scenic Overlook, and as such, there is the possibility that the proposed 5850 Project could block a portion of the view of the Los Angeles Basin, as viewed from this location. However, the 5850 Project would only block a small portion of this view and the remainder of the Los Angeles Basin would still be viewable from the Scenic Overlook. Further, the Baldwin Hills Scenic Overlook contains a large viewing area. Therefore, as a person stands at different locations at the Scenic Overlook, different portions of the Los Angeles Basin would be in view (see Figure 4-1). In addition, the Los Angeles Basin contains many other buildings of the same height as the proposed 5850 Project, including a 320-foot-tall tower currently under construction at the corner of Jefferson and La Cienega Boulevards and the (W)rapper tower, which would be approximately 230 feet in height, currently under construction at the corner of Jefferson and National Boulevards, both of which are also viewable from the Baldwin Hills Scenic Overlook. As the majority of the Los Angeles Basin would remain viewable from the Baldwin Hills Scenic Overlook even with development of the 5850 Project, the 5850 Project's impacts with respect to scenic vistas would be less than significant. Pursuant to SB 743 and ZI No. 2452, the 5850 Project's impacts with respect to scenic vistas would be less than significant.

Scenic Resources

As stated below under "Biological Resources," the Project Site does not contain any protected trees. Further, the Project Site does not contain any rock outcroppings, nor is it located within a State scenic highway. Finally, as discussed below under "Cultural Resources," the 5850 Project would not result in any impacts with respect to historic resources. Therefore, the 5850 Project would result in no impact with respect to scenic resources. Pursuant to SB 743 and ZI No. 2452, the 5850 Project would result in no impact with respect to scenic resources.

[10] Requested discretionary actions and approvals for the 5850 Project are listed in Section 1.3.3, above.

Visual Character

Construction

Construction activities at the Project Site would be mostly visible from the surrounding uses, and are estimated to occur over approximately 30 months. Construction activity would vary on a weekly basis, depending largely on the number of workers and construction trucks needed for the activities during each time period. Temporary fencing would be installed around the Project Site during construction, which would partially shield views of construction activities and equipment. Though the 5850 Project's construction activities would be visible from adjacent public and private vantage points, changes to the appearance of the Project Site would be temporary in nature. Temporary construction changes are necessary for the development of the Project Site, and would not rise to the level of a change that would substantially degrade the existing visual character. Therefore, no impacts with respect to visual character would occur during construction.

Operation

As described above, the 5850 Project includes an amendment to the West Adams CPIO to increase the maximum height for the Project Site, up to 320 feet. The 5850 Project is consistent with the permitted floor area ratio (FAR) for the Project Site. The increased height allows for more of the Project Site to be enhanced with landscaping and open spaces that promote human interaction and provide community gathering spaces. The 5850 Project would preserve viable industrial and hybrid industrial land for "clean-tech" and "high-tech" uses, would support other transit-oriented businesses, and would support the creation of high wage jobs and training within the West Adams CPA. Finally, the proposed amendment to the CPIO would not change the General Plan land use designation of Hybrid Industrial for the Project Site.

The 5850 Project provides for an arrangement of buildings and structures, and other improvements that are compatible with the scale and character of the adjacent properties and the surrounding neighborhood. The 5850 Project has been designed to be compatible with neighboring properties. The Project Site and the surrounding area belongs, to a burgeoning creative digital and entertainment community of buildings and users including, Nike, the Tennis Channel, Converse, Blur Studio, WeWork and others in the nearby vicinity. Neighboring buildings in the Project vicinity range in height from one to three stories up to 17 and 30 stories (and 230 to 320 feet in height), which are consistent with the proposed 320-foot 22-story 5850 Project. In fact, the 5850 Project is compatible with recent developments that have been taller in height (between 17 and 30 stories) in response in part to the nearby Metro Expo Line station at Jefferson and La Cienega Boulevards.

With respect to building design and pedestrian orientation, the vast majority of the parking spaces would be provided in four subterranean parking levels, allowing for the generous landscaping and open spaces proposed. The requested increase in height would allow the Project Site to be designed in compatibility with existing and under construction development on nearby properties and neighboring properties that are 17 to 30 stories.

The 5850 Project's architectural design is the aggregate of multiple parts offering varying forms

and dimensions for a variety of office related purposes that is compatible with the light industrial area. The design of the building is comprised of four components. The first built component is the four levels of subterranean parking, and the second is composed of four on-grade, green-roofed open spaces – one at each corner of four corners of the Project Site. The third component, the base, contains three floors with a trussed perimeter, designed to accommodate large horizontal expanses of flexible office, meeting, and production uses, located centrally within the base. The fourth component, the tower, emerges vertically from the base. It begins with a circular plan at a 49-foot height, and evolves in shape to a simple rectangular plan at a roof deck top. Each floor perimeter differs slightly from the adjacent floors above and below as the tower gradually transitions from round to rectangular. Stairs, elevators, bathrooms, and mechanical equipment are contained in the two vertical cores, which begin in the subterranean parking, pass through the base, and emerge from the curtain wall as external elements as the tower ascends. The evolution in the tower form is ratified by the curtain wall itself which begins as an orthogonal combination of vertical and horizontal mullion lines and rectangular glazing pieces at the roof top, and evolves over the course of the tower's descent, gradually becoming a series of radial mullions and curving glass indicating the tower shape change from rectangular to curving floor plan.

Access to the loading and service area of the building is provided along the existing private driveway on the northern perimeter of the Project Site. In order to screen these areas from public view, it has been integrated into the landscape mounds on the easterly portion of the Project Site. Vehicles maneuvering into the service area can be accommodated on-site without impact to public streets.

The design of the 5850 Project includes extensive landscaping and open space. Along a pedestrian route from the Metro Expo Line through a sequence of new and retrofitted office structures is a mixture of trees, paths, and green landscape. Seating, gathering, and walking paths culminate on the Project Site in the park-like venue that surrounds and organizes access to the proposed building. The building base is set back approximately 166 feet from the east property line, 97 feet from the south, up to 12 feet five inches to the west, and 160 feet from the north.

Within that landscape are building accoutrements – stacks, flues, vents, grills, louvers, windows – that provide clues as to office, pedestrian gathering areas, parking and utility uses hidden below the horticulture. Landscaping amenities including seating, meeting areas, barbeque space, and more generally a rolling, sometimes terraced, green landscape interspersed with hardscape venues, surround pedestrians on the way to the first office floor and entry lobby. The central lobby is accessed and entered from the park from four directions, north, south, east, and west.

The 5850 Project is located along Jefferson Boulevard and placed in a park-like setting that includes approximately 47,854 square feet of landscaping. The Project Site rises upward toward the 5850 Project building in a series of four perimeter mounds that slope from grade level to the second floor of the 5850 Project. The mounds serve as a visual transition upward as the building appears to rise up out of the land. These mounded areas define the primary entry points to the building located in wide open plazas with landscape, hardscape, and pedestrian

seating. The mounds provide a buffer between the two largest plazas and the automobile areas of the parking lot and Jefferson Boulevard. These mounds provide a green roof for interior office spaces. The northeast mound accommodates the loading areas of the 5850 Project, and the southeast mound integrates the access ramp for the subterranean parking structure. The mounds are planted with a combination of native plants and grasses that require low water and provide a diverse range of colors and textures. Pedestrian pathways that lead to building entrances feature decorative paving with integrated benches and pathway lighting.

The 5850 Project not only provides for an arrangement of uses, buildings, structures, open spaces, and other improvements that are compatible with the scale and character of the adjacent properties and the surrounding neighborhood, but would also enhance the surrounding neighborhood. Therefore, the 5850 Project's impacts with respect to visual character would be less than significant. Pursuant to SB 743 and ZI No. 2452, the 5850 Project's impacts with respect to visual character would be less than significant.

Light and Glare

The 5850 Project would include lighting designed to highlight architectural elements of the structures. Security lighting would be installed to deter criminal activity on the Project Site. The lights associated with the 5850 Project would be directed toward the interior of the Project Site so as not to create impacts to surrounding land uses or motorists traveling on surrounding roadways. All exterior lighting would be designed with internal and/or external glare control and would also be designed, arranged, directed, or shielded to contain direct illumination on-site, thereby preventing excess illumination and light spillover onto adjacent land uses and/or roadways. Blinking, flashing, or oscillating lights would be prohibited. Due to its scale in relation to existing development in the Project vicinity, light generated from the interior of the proposed building could potentially be seen from outside the immediate vicinity of the Project Site. However, the increase in light that would be generated would not be out of character with the existing light sources in the Project vicinity. In addition, the 5850 Project would implement Mitigation Measure AE2 from the Certified EIR, which ensures that all lighting would be directed on-site and/or shielded to minimize spillover effects onto nearby properties. As such, nighttime views in the Project vicinity would not be affected by the 5850 Project, and impacts with respect to light would be less than significant. Pursuant to SB 743 and ZI No. 2452, the 5850 Project's impacts with respect to light would be less than significant.

The 5850 Project's architectural features and facades would not be constructed of highly reflective materials, and therefore would not be expected to affect daytime views. Materials used on the façade of the proposed office building would include concrete, spandrel glass, and vision glass, and the glass included on the façade would not be highly reflective. In addition, the 5850 Project would implement Mitigation Measure AE3 from the Certified EIR, which would ensure that non-reflective building materials are used. As such, daytime views in the 5850 Project vicinity would not be affected by the 5850 Project, and impacts with respect to glare would be less than significant. Pursuant to SB 743 and ZI No. 2452, the 5850 Project's impacts with respect to glare would be less than significant.

Shade and Shadow

Summer shadows resulting from the 5850 Project are shown in Figure 4-2. As shown, the 5850 Project would cast shadows to the west at 9:00 AM on the summer solstice. These shadows would fall on Jefferson Boulevard, the Ballona Creek, and a small portion of the commercial uses located further to the west. At 1:00 PM on the summer solstice, the 5850 Project would cast very limited shadows that would be contained within the Project Site itself. Finally, at 5:00 PM on the summer solstice, the 5850 Project would cast shadows to the east, shading commercial uses located to the east of the Project Site. As shown on Figure 4-2, no sensitive uses would be shaded for more than four hours between the hours of 9:00 AM and 5:00 PM. Consequently, the 5850 Project would have no impact with respect to summer shadows.

Winter shadows resulting from the 5850 Project are shown in Figure 4-3. As shown, the 5850 Project would cast shadows to the northwest at 9:00 AM on the winter solstice. These shadows would fall on Jefferson Boulevard, the Ballona Creek, and commercial/industrial uses located northwest of the Project Site. At 12:00 PM on the winter solstice, the 5850 Project would cast shadows to the north, shading the commercial uses located immediately adjacent to the Project Site on the north. Finally, at 3:00 PM on the winter solstice, the 5850 Project would cast shadows to the northeast, shading commercial and industrial uses located to the northeast of the Project Site. As shown on Figure 4-3, no sensitive uses would be shaded for more than three hours between the hours of 9:00 AM and 3:00 PM. Consequently, the 5850 Project would have no impact with respect to winter shadows.

Pursuant to SB 743 and ZI No. 2452, the 5850 Project would have no impact with respect to shade and shadow.

Mitigation Measures

The 5850 Project would implement Mitigation Measures AE2 and AE3 from the Certified EIR. The Project Site does not directly abut residentially-planned land, nor is the Project Site located across an alley from residentially-planned land. Therefore, Mitigation Measure AE1 from the Certified EIR would not be applicable to the 5850 Project.

4.1.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

The 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIR.

4.1.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to visual or aesthetic resources. No substantial changes in the aesthetic or visual environment have occurred since certification of the EIR, and no substantial new scenic resources have been

identified within the vicinity of the Project Site that would result in new or more severe significant environmental impacts.

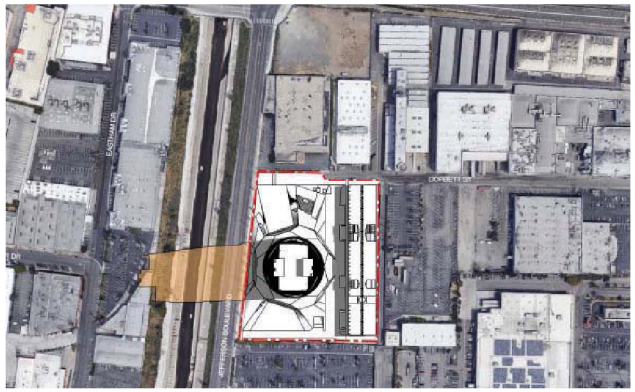
4.1.5 EIR's Mitigation Measures Addressing Impact

As stated above, the 5850 Project would implement Mitigation Measures AE2 and AE3 from the Certified EIR. However, Mitigation Measure AE1 from the Certified EIR would not be applicable to the 5850 Project.

4.1.6 Conclusion

Based on the above, no new significant aesthetic impacts or a substantial increase in previously identified aesthetic impacts would occur as a result of the 5850 Project. Therefore, the 5850 Project does not meet the conditions for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

Figure 4-1
View from Baldwin Hills Scenic Overlook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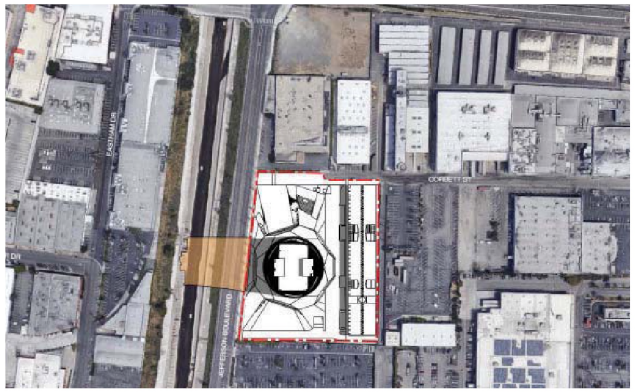
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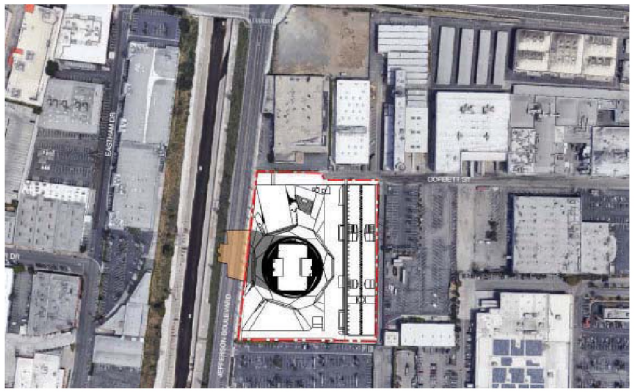
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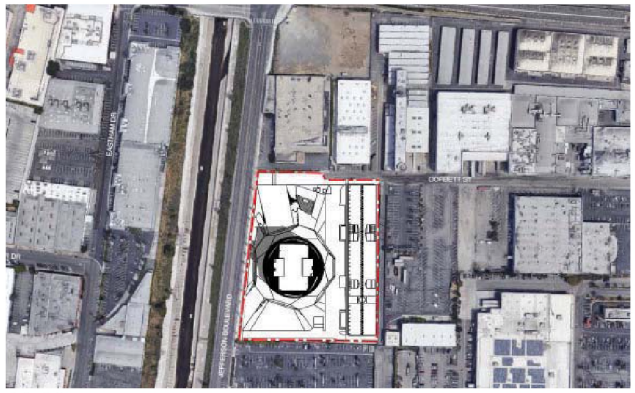
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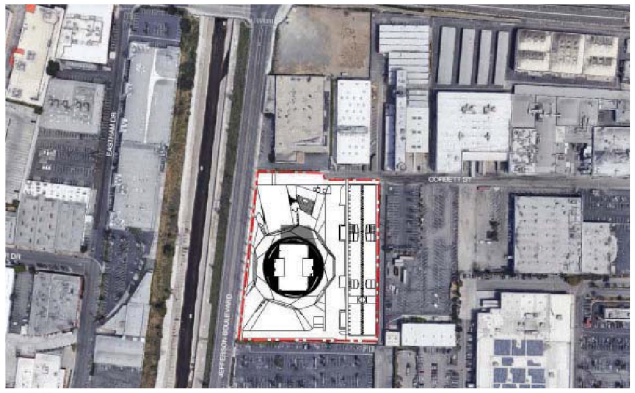
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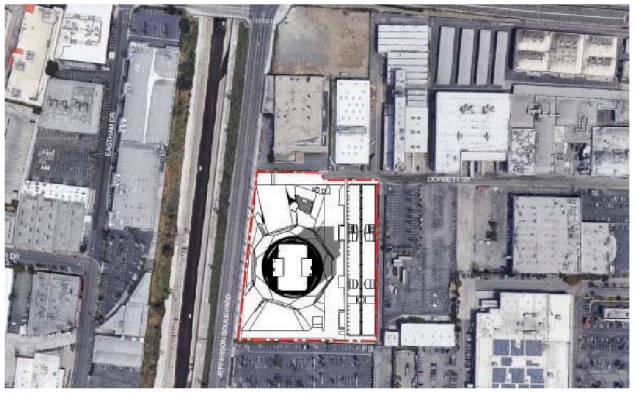
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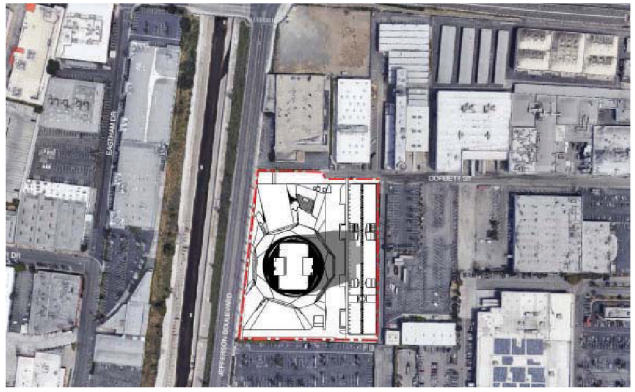
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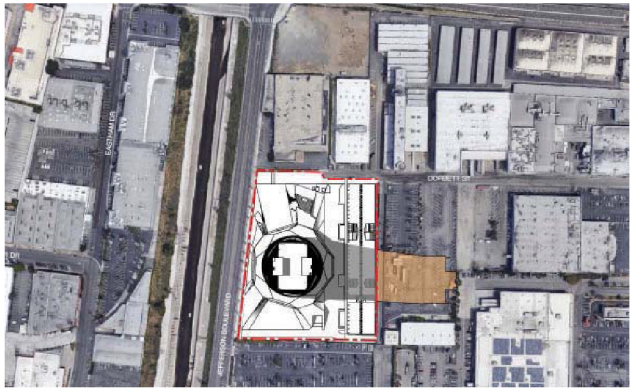
4.00pm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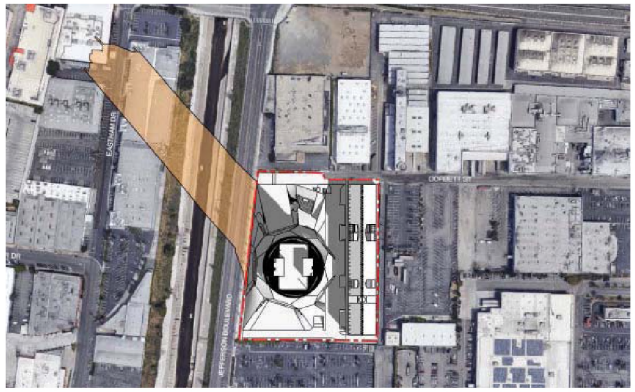
Source: Eric Owen Moss Architects, 08/22/2019.

Figure 4-2
Summer Shadows



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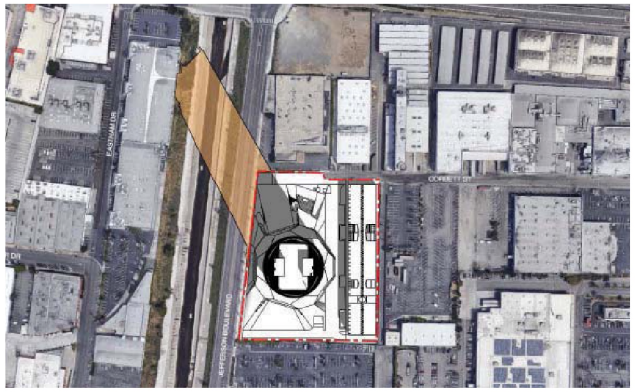

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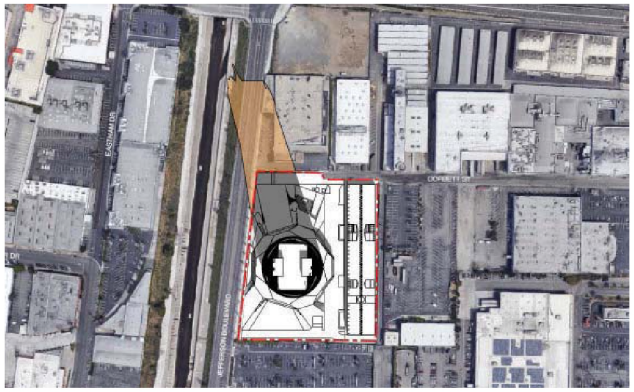

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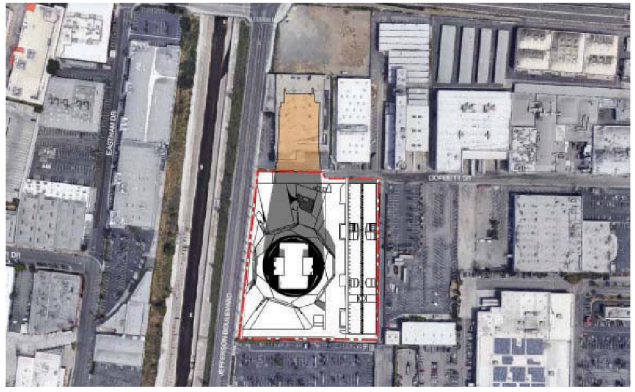

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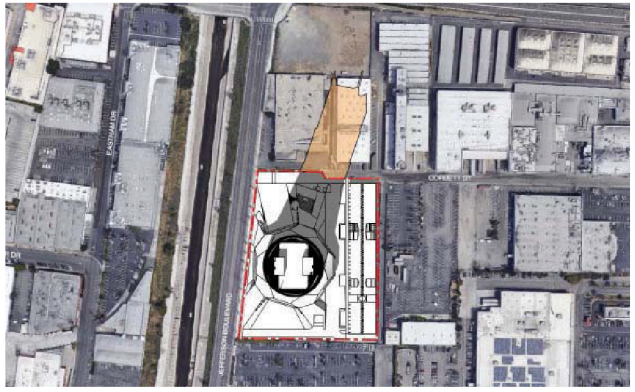

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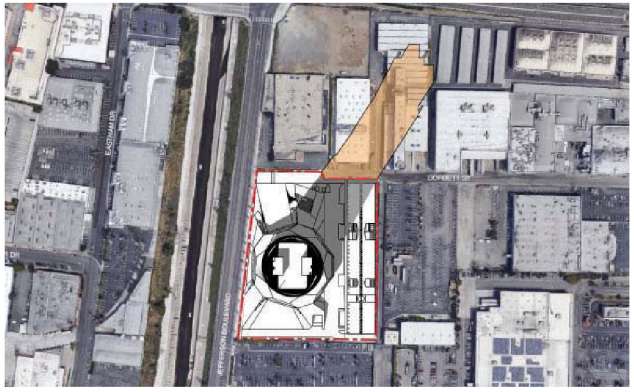

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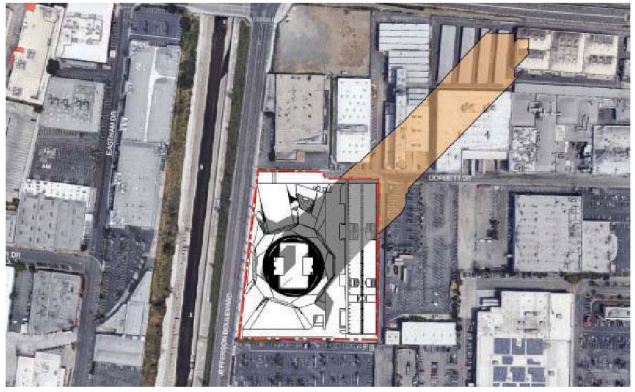

3.00pm

Source: Eric Owen Moss Architects, 08/22/2019.

Figure 4-3
Winter Shadows

4.2 Agriculture and Forestry Resources

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
AGRICULTURE AND FORESTRY RESOURCES: Would the project:					
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No Impact	No	No	No	No
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact	No	No	No	No
(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	No Impact	No	No	No	No
(d) Result in the loss of forest land or conversion of forest land to non-forest use?	No Impact	No	No	No	No
(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	No	No	No	No

4.2.1 Impact Determination in the EIR

The Certified EIR stated that a review of the maps compiled by the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP) indicates that the West Adams CPA is mapped as an "urbanized area" and does not have properties that contain prime or important farmlands. There are no properties located in the West Adams CPA that are zoned for agriculture use, and there are no agriculture land uses in the West Adams CPA. Vegetation within the West Adams CPA consists largely of non-native ornamental trees,

grasses, and shrubs that are typical of urban landscaping. The West Adams CPA and surrounding area are fully developed and urbanized, and there are no timberlands in the vicinity of the West Adams CPA. As stated in the Certified EIR, the City land use and zoning maps show there is no forest land defined as timberland or timberland production in the West Adams CPA. As there are no agriculture or forestry resources within the West Adams CPA, the Community Plan and its implementing ordinances do not contain any specific guidelines that would affect farmland, agricultural land, timberland, or forest land. Therefore, implementation of the Community Plan would have no construction or operational impacts related to agriculture and forestry resources.

Mitigation Measures

No impacts related to agricultural and forestry resources were determined for the Community Plan, and no mitigation measures were required.

4.2.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As stated in the Certified EIR, the West Adams CPA does not contain land uses that are considered prime or important farmlands, agricultural land uses, timberlands, or forest land. The Project Site is currently developed with commercial land uses, and would remain designated for Hybrid Industrial land uses after development of the 5850 Project. Therefore, the 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Mitigation Measures

None required.

4.2.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

The 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIR.

4.2.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to agricultural or forestry resources. No substantial changes have occurred since certification of the EIR, and no new agricultural or forestry resources have been identified within the vicinity of the 5850 Project that would result in new or more severe significant environmental impacts. Finally, as it has been determined the 5850 Project will not result in any agricultural or forestry resources impacts, a review of feasible mitigation measures is not required.

4.2.5 EIR's Mitigation Measures Addressing Impact

Because the Certified EIR determined the Project would have no impacts on agricultural or forestry resources, no mitigation measures were required. Implementation of the 5850 Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.2.6 Conclusion

Based on the above, no new significant impacts or a substantial increase in previously identified impacts to agricultural or forestry resources would occur as a result of the 5850 Project. Therefore, the 5850 Project does not meet the conditions for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.3 Air Quality

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
AIR QUALITY: Would the project:					
(a) Conflict with or obstruct implementation of the applicable air quality plan?	Less Than Significant Impact	No	No	No	No
(b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Significant and Unavoidable	No	No	No	No
(c) Expose sensitive receptors to substantial pollutant concentrations?	Significant and Unavoidable	No	No	No	No
(d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	Less Than Significant	No	No	No	No

This section is based on the Certified EIR and the following item, which is included as **Appendix A** to this Addendum:

A Air Quality and Greenhouse Gas Emissions Technical Modeling, DKA Planning, August 2019.

4.3.1 Impact Determination in the EIR

Construction

The Certified EIR stated that implementation of the Community Plan would allow for an increase in the capacity for development in the West Adams CPA by 3.8 million square feet of commercial space, 2.3 million square feet of public facility, and 19,703 dwelling units. Construction activity has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from individual project sites. As shown in the Certified EIR, average construction emissions for the potential West Adams CPA developments would exceed South Coast Air Quality Management District (SCAQMD) regional thresholds for VOC and NOx, but would be well below the CO, SOx, PM_{10}, and $PM_{2.5}$ thresholds. Moreover, the Certified EIR stated that construction activity would likely exceed the localized significance thresholds for NOx, $PM_{2.5}$, and PM_{10}. Therefore, without mitigation, the Certified EIR determined that implementation of the

Community Plan would result in a significant impact related to regional and localized construction emissions. Mitigation Measure AQ1 was adopted in the Certified EIR to ensure compliance with SCAQMD Rule 403, to reduce VOC emissions, control exhaust emissions, and limit pollutant concentrations. Nonetheless, the Certified EIR concluded that even with implementation of Mitigation Measure AQ1, impacts related to regional and localized air quality emissions would remain significant and unavoidable.

Odors may be emitted during project construction by equipment exhaust and architectural coatings. However, these sources would be localized and temporary in nature. Therefore, impacts from construction odors were determined to be less than significant. Finally, as stated in the Certified EIR, the Community Plan would not interfere with the implementation of the standards and strategies of the Air Quality Management Plan (AQMP). Therefore, the Certified EIR determined that implementation of the Community Plan would result in a less than significant impact related to consistency with the AQMP.

Operation

As stated in the Certified EIR, future daily emissions under implementation of the Community Plan are expected to decrease from existing emissions for all of the assessed pollutants except VOC. This is largely a result of reductions in vehicle emissions that are projected to occur between 2008 and 2030 due to stricter regulations and improved technology. The Certified EIR stated that VOC emissions would increase as a result of architectural coating emissions associated with new residential land uses. However, the increase in VOC emissions would be less than the SCAQMD daily significance threshold. Therefore, the Certified EIR determined that implementation of the Community Plan would result in a less than significant impact related to regional operational emissions.

With respect to localized operational emissions, as stated in the Certified EIR, the State one- and eight-hour standards of 20 and 9.0 ppm, respectively, would not be exceeded at any intersection within the West Adams CPA. Therefore, the Certified EIR determined that implementation of the Community Plan would result in a less than significant impact related to mobile source CO concentrations. The I-10 Freeway runs through the West Adams CPA; therefore, if receptors are sited within close proximity to the freeway, impacts with respect to toxic air contaminants would be potentially significant. The City of Los Angeles recently amended the LAMC to require new residential and commercial buildings located within 1,000 feet of freeways follow standards to reduce health risks from mobile sources. Therefore, the Certified EIR determined that implementation of the Community Plan would result in a less than significant impact related to operational toxic air contaminant emissions.

According to the Certified EIR, the West Adams CPA is not anticipated to be developed with land uses that are typically associated with odor complaints. The majority of development would be typical residential and commercial uses. Therefore, the Certified EIR concluded that implementation of the Community Plan would result in a less than significant impact related to operational odors. The Community Plan would also be consistent with the AQMP goals to reduce pollution levels. Therefore, the Certified EIR determined that implementation of the

Community Plan would result in a less than significant impact related to consistency with the AQMP.

Mitigation Measures

The following mitigation measure was included in the Certified EIR to reduce impacts related to air quality:

AQ1 Any approval of a Discretionary project or *"Active Change Area Project",* shall ensure that all contractors include the following best management practices in contract specifications:

- Use properly tuned and maintained equipment.
- Contractors shall enforce the idling limit of five minutes as set forth in the California Code of Regulations.
- Use diesel-fueled construction equipment to be retrofitted with after treatment products (e.g. engine catalysts) to the extent they are readily available and feasible.
- Use heavy-duty diesel-fueled equipment that uses low NOx diesel fuel to the extent it is ready available and feasible.
- Use construction equipment that uses low polluting fuels (i.e. compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent available and feasible.
- Maintain construction equipment in good operating condition to minimize air pollutants.
- All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with Best Available Control Technologies devices certified by the California Air Resources Board (CARB). Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- Construction contractors shall use electricity from power poles rather than temporary gasoline or diesel power generators, as feasible.
- Use building materials, paints, sealants, mechanical equipment, and other materials that yield low air pollutants and are nontoxic.

- Construction contractors shall utilize super-compliant architectural coatings as defined by the South Coast Air Quality Management District (VOC standard of less than ten grams per liter).

- Construction contractors shall utilize materials that do not require painting, as feasible.

- Construction contractors shall use pre-painted construction materials, as feasible.

- Construction contractors shall provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.

- Construction contractors shall provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site as feasible.

- Construction contractors shall reroute construction trucks away from congested streets or sensitive receptor areas as feasible.

- Construction contractors shall appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.

4.3.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The 5850 Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the 5850 Project's air quality impacts were accounted for within the analysis contained in the Certified EIR.

Air Quality Plan

SCAQMD CEQA Air Quality Handbook Policy Analysis and SCAG 2016-2040 RTP/SCS Consistency

The following analysis addresses the 5850 Project's consistency with applicable SCAQMD and Southern California Association of Governments (SCAG) policies, including the SCAQMD's 2016 AQMP and growth projections within the SCAG 2016–2040 RTP/SCS. In accordance with the procedures established in the SCAQMD's *CEQA Air Quality Handbook*, the following criteria are required to be addressed in order to determine the 5850 Project's consistency with applicable SCAQMD and SCAG policies:

- Would the project result in any of the following:

  – An increase in the frequency or severity of existing air quality violations; or

- Cause or contribute to new air quality violations; or
- Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

- Would the project exceed the assumptions utilized in preparing the AQMP?
  - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
  - Does the Project include air quality mitigation measures; or
  - To what extent is Project development consistent with the AQMP land use policies?

With respect to the first criterion, as discussed below, localized concentrations of NO_2 as NO_X, CO, PM_{10}, and $PM_{2.5}$ have been analyzed for the 5850 Project through an analysis of construction and operational emissions. As shown in Tables 4.3-3 and 4.3-4 below, these emissions would not exceed the SCAQMD's screening thresholds. These represent thresholds when exceedances of health-based air quality standards could occur. SO_2 emissions would be negligible during construction and long-term operations, and, therefore, would not have the potential to cause or affect a violation of the SO_2 ambient air quality standard. Since VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. Due to the role VOCs play in O_3 formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

Particulate matter is the primary pollutant of concern during construction activities, and, therefore, the 5850 Project's PM_{10} and $PM_{2.5}$ emissions during construction were analyzed in order to: (1) ascertain potential effects on localized concentrations; and (2) determine if there is a potential for such emissions to cause or affect a violation of the ambient air quality standards for PM_{10} and $PM_{2.5}$. As demonstrated in the analysis below (see Table 4.3-3 later in this section), the increases in PM_{10} and $PM_{2.5}$ emissions during construction would not exceed the SCAQMD-recommended significance thresholds at sensitive receptors in proximity to the Project Site.

Additionally, the 5850 Project's maximum potential NO_X and CO daily emissions during construction were analyzed to ascertain potential effects on localized concentrations and to determine if there is a potential for such emissions to cause or affect a violation of an applicable ambient air quality standard. As shown in Table 4.3-3, NO_X and CO would not exceed the SCAQMD-recommended localized significance thresholds. Therefore, 5850 Project construction would not result in a significant impact with regard to localized air quality.

Because the 5850 Project would not introduce any substantial stationary sources of emissions, CO is the preferred benchmark pollutant for assessing local area air quality impacts from post-

construction motor vehicle operations.[11] As discussed below, no intersections would require a CO hotspot analysis, and impacts would be less than significant. Therefore, the 5850 Project would not increase the frequency or severity of an existing CO violation or cause or contribute to new CO violations.

As discussed below, an analysis of potential localized operational impacts from on-site activities was conducted. As demonstrated in the analysis below (see Table 4.3-4 later in this section), localized NO_2 as NO_X, CO, PM_{10}, and $PM_{2.5}$ operational impacts would be less than significant. Therefore, the 5850 Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants. As the 5850 Project would not exceed any of the state and federal standards, the 5850 Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2016–2040 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these three criteria.

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

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

The 2016–2040 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. As stated in the Transportation Assessment prepared for the 5850 Project (included in Appendix F to this Addendum, see specifically Section 3B (VMT Analysis)), development of the 5850 Project could result in approximately 1,380 employment positions on-site. According to the 2016–2040 RTP/SCS, the employment forecast for the City of Los Angeles in 2012 was approximately 1,696,400 employees. In 2040, the City of Los Angeles is anticipated to have approximately 2,169,100 employees. Thus, the 5850 Project's estimated 1,380 employees would constitute approximately 0.29 percent of the employment growth forecasted between 2012 and 2040.

[11] SCAQMD, CEQA Air Quality Handbook, Chapter 12, Assessing Consistency with Applicable Regional Plans, 1993.

Because the 5850 Project's resulting employment growth would fall well within the growth forecasts for the City and similar projections form the basis of the 2016 AQMP, it can be concluded that the 5850 Project would be consistent with the projections in the AQMP.

- Does the project implement feasible air quality mitigation measures?

As discussed below, the 5850 Project would not result in any significant air quality impacts and therefore would not require mitigation. In addition, the 5850 Project would comply with all applicable regulatory standards as required by SCAQMD. As such, the 5850 Project meets this AQMP consistency criterion.

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

With regard to land use developments such as the 5850 Project, the AQMP's air quality policies focus on the reduction of VMT. The 5850 Project would be designed and constructed to support and promote environmental sustainability. The 5850 Project represents an infill development within an existing urbanized area that would concentrate new offices uses within a High Quality Transit Area (HQTA). "Green" principles are also incorporated throughout the 5850 Project to comply with the City of Los Angeles Green Building Code and the California Green Building Standards Code (CALGreen) through energy conservation, water conservation, and waste reduction features.

The air quality plan applicable to the 5850 Project area is the 2016 AQMP. The 2016 AQMP is the SCAQMD plan for improving regional air quality in the Basin. The 2016 AQMP is the current management plan for continued progression toward clean air and compliance with State and federal requirements. It includes a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, on- and off-road mobile sources and area sources. The 2016 AQMP also incorporates current scientific information and meteorological air quality models. It also updates the federally approved 8-hour O_3 control plan with new commitments for short-term NO_X and VOC reductions.

The 2016 AQMP includes short-term control measures related to facility modernization, energy efficiency, good management practices, market incentives, and emissions growth management. As demonstrated in the following analyses, the 5850 Project would not result in significant regional emissions. The 2016 AQMP adapts previously conducted regional air quality analyses to account for the recent unexpected drought conditions and presents a revised approach to demonstrated attainment of the 2006 24-hour $PM_{2.5}$ National Ambient Air Quality Standards (NAAQS) for the Basin. Directly applicable to the 5850 Project, the 2016 AQMP proposes robust NO_X reductions from commercial appliances and commercial space heating. The 5850 Project would be required to comply with all new and existing regulatory measures set forth by the SCAQMD. Implementation of the 5850 Project would not interfere with air pollution control measures listed in the 2016 AQMP.

The Project Site is classified as "Hybrid Industrial" in the General Plan Framework and the Community Plan, a classification that allows general office uses by right. As such, the RTP/SCS' assumptions about growth in the City accommodate job growth on the Project Site.[12] As a result, the 5850 Project would be consistent with the growth assumptions in the City's General Plan. Because the AQMP accommodates growth forecasts from local General Plans, the emissions associated with the 5850 Project are accounted for and mitigated in the region's air quality attainment plans. The air quality impacts of development on the Project Site are accommodated in the region's emissions inventory for the 2016 RTP/SCS and 2016 AQMP. Therefore, the 5850 Project's impacts with respect to consistency with the AQMP would be less than significant.

City of Los Angeles Policies

The 5850 Project would offer convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in VMT. In addition, the 5850 Project would be consistent with the existing land use pattern in the vicinity that concentrates urban density along major arterials and near transit options. The 5850 Project is a short distance from transit stops, including the Metro Expo Line Station at Jefferson and La Cienega Boulevards, approximately 1,100 feet northeast of the Project Site.

The 5850 Project would be consistent with applicable policies of the Air Quality Element, and would implement sustainability features that would reduce vehicular trips, reduce VMT, and encourage use of alternative modes of transportation. The City's General Plan Air Quality Element identifies 30 policies with specific strategies for advancing the City's clean air goals. As illustrated in Table 4.3-1, the 5850 Project is consistent with the applicable policies in the Air Quality Element. Therefore, the 5850 Project would result in less than significant impacts related to consistency with the Air Quality Element.

Table 4.3-1
5850 Project Consistency With City Of Los Angeles General Plan Air Quality Element

Strategy	5850 Project Consistency
Policy 1.3.1. Minimize particulate emissions from construction sites.	**Consistent.** The 5850 Project would minimize particulate emissions during construction through best practices and/or SCAQMD rules.
Policy 1.3.2. Minimize particulate emissions from	**Consistent.** The 5850 Project would minimize

[12] As noted earlier in this section, the 5850 Project could generate approximately 1,380 employment positions on-site. According to the 2016–2040 RTP/SCS, the employment forecast for the City of Los Angeles in 2012 was 1,696,400 employees. In 2040, the City of Los Angeles is anticipated to have 2,169,100 employees. Thus, the 5850 Project's estimated 1,380 employees would constitute 0.29 percent of the projected job growth between 2012 and 2040. Because the 5850 Project's resulting employment growth would fall well within the growth forecasts for the City and similar projections form the basis of the 2016 RTP/SCS and 2016 AQMP, it can be concluded that the 5850 Project would be consistent with the projections in both the RTP/SCS and the AQMP.

Table 4.3-1
5850 Project Consistency With City Of Los Angeles General Plan Air Quality Element

Strategy	5850 Project Consistency
unpaved roads and parking lots associated with vehicular traffic.	particulate emissions from unpaved facilities through best practices and/or SCAQMD rules.
Policy 2.1.1. Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**Consistent.** The 5850 Project would be located in the Baldwin Hills neighborhood, an urban area with significant transportation infrastructure, including Metro bus service on La Cienega Boulevard (Metro 4, 105, 217, 705) and Jefferson Boulevard (Metro 38, 217), as well as a Metro Expo Line light-rail station at La Cienega Boulevard and Jefferson Boulevard, approximately 1,100 feet northeast of the Project Site. As discussed in the Project's Transportation Assessment (included as Appendix F-2 to this Addendum), the Project would include a Transportation Demand Management (TDM) Program that would include strategies to reduce vehicle trips and/or VMT.
Policy 2.1.2. Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	**Consistent.** Where appropriate, the Project Applicant and/or future employers could encourage telecommuting with future tenants.
Policy 2.2.1. Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	**Consistent.** As discussed in the Project's Transportation Assessment (included as Appendix F-2 to this Addendum), the Project would include a TDM Program that would include strategies to reduce vehicle trips and/or VMT.
Policy 2.2.2. Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	**Consistent.** Where appropriate, the 5850 Project may include parking management practices in the future to reduce single-occupancy vehicle trips. In addition, the provision of Metro bus service on La Cienega Boulevard (Metro 4, 105, 217, 705) and Jefferson Boulevard (Metro 38, 217), as well as a Metro Expo Line light-rail station at La Cienega Boulevard and Jefferson Boulevard, approximately 1,100 feet northeast of the Project Site, would further reduce single-occupant vehicle travel. Finally, the provision of 35 short- and 69 long-term bicycle parking spaces could reduce demand for auto parking.
Policy 2.2.3. Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.	**Not Applicable.** The 5850 Project would not include facilities for special events or be located in an area or time of high level of pedestrian activities.
Policy 3.2.1. Manage traffic congestion during peak hours.	**Consistent.** As provided below in the "Transportation" subsection, the 5850 Project's traffic impacts would be less than significant. In addition, as discussed in the Project's Transportation Assessment (included as

Table 4.3-1
5850 Project Consistency With City Of Los Angeles General Plan Air Quality Element

Strategy	5850 Project Consistency
	Appendix F-2 to this Addendum), the Project would include a TDM Program that would include strategies to reduce vehicle trips and/or VMT. Finally, upon operations of the 5850 Project, employers could promote alternative travel modes that take advantage of the 5850 Project's proximity to substantial local and rapid bus service, as well as access to the Metro Expo Line, approximately 1,100 feet northeast of the Project Site.
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	**Consistent.** The 5850 Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Metro, and other regional agencies on the coordination of land use, air quality, and transportation policies.
Policy 4.1.2. Ensure that project level review and approval of land use development remains at the local level.	**Consistent.** The 5850 Project would be entitled and environmentally cleared at the local level.
Policy 4.2.1. Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	**Consistent.** The 5850 Project would be infill development that would provide jobs that are easily accessible to those who live in the Project area and public transit.
Policy 4.2.3. Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Consistent.** The 5850 Project would be located in an urban area with significant infrastructure to facilitate alternative transportation modes, including close proximity to bus routes and rail service operating by Metro. The inclusion of 35 short- and 69 long-term bicycle parking spaces will support this policy, along with pre-wiring for electric vehicle charging stations. Further, the 5850 Project would enhance the existing streetscape and pedestrian environment with a design that places parking in subterranean levels and includes approximately 100,054 square feet of open space, including 47,854 square feet of landscaping with pathways, paseos, and community seating and gathering areas.
Policy 4.2.4. Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**Consistent.** The 5850 Project's air quality impacts are analyzed in this document.
Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for	**Consistent.** The 5850 Project would be located in an urban area with significant infrastructure to facilitate

Table 4.3-1
5850 Project Consistency With City Of Los Angeles General Plan Air Quality Element

Strategy	5850 Project Consistency
discretionary projects.	alternative transportation modes, including Metro bus service on La Cienega Boulevard (Metro 4, 105, 217, 705) and Jefferson Boulevard (Metro 38, 217), as well as a Metro Expo Line light-rail station at La Cienega Boulevard and Jefferson Boulevard, approximately 1,100 feet northeast of the Project Site. In addition, as discussed in the Project's Transportation Assessment (included as Appendix F-2 to this Addendum), the Project would include a TDM Program that would include strategies to reduce vehicle trips and/or VMT.
Policy 4.3.1. Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to minimize significant health risks posed by air pollution sources.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 4.3.2. Revise the City's General Plan/Community Plans to ensure that new or relocated major air pollution sources are located to minimize significant health risks to sensitive receptors.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 5.1.1. Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's water port and airport facilities.
Policy 5.1.2. Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	**Not Applicable.** This policy calls for cleaner operations of the City's buildings and operations.
Policy 5.1.3. Have the Department of Water and Power make improvements at its in-basin power plants in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's Water and Power energy plants.
Policy 5.1.4. Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	**Consistent.** This policy calls for the City to encourage waste reduction and recycling. Nevertheless, the 5850 Project would be consistent with this policy by complying with Title 24, CALGreen, and other requirements to reduce solid waste and energy consumption.
Policy 5.2.1. Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.	**Not Applicable.** This policy calls for the City to gradually reduce the fleet emissions inventory from its vehicles through use of alternative fuels, improved maintenance practices, and related operational improvements.
Policy 5.3.1. Support the development and use of equipment powered by electric or low-emitting fuels.	**Consistent.** The 5850 Project would be designed to meet the applicable requirements of the State's Green

Table 4.3-1
5850 Project Consistency With City Of Los Angeles General Plan Air Quality Element

Strategy	5850 Project Consistency
	Building Standards Code and the City of Los Angeles' Green Building Code.
Policy 6.1.1. Raise awareness through public-information and education programs of the actions that individuals can take to reduce air emissions.	**Not Applicable.** This policy calls for the City to promote clean air awareness through its public awareness programs.
Source: DKA Planning, 2019.	

Construction

Construction-related emissions were estimated using the SCAQMD's CalEEMod 2016.3.2 model using assumptions from the 5850 Project's developer, including the 5850 Project's construction schedule of approximately 30 months. Table 4.3-2 summarizes the potential construction schedule that was modeled for air quality impacts.

Table 4.3-2
Estimated 5850 Construction Schedule

Phase	Duration
Demolition	Months 1-2
Grading	Months 3-8
Building Construction	Months 9-30
Paving	Months 28-29
Architectural Coatings	Months 24-29
Source: DKA Planning, 2019	

The 5850 Project would be required to comply with the following regulations, as applicable:

- SCAQMD Rule 403, which would reduce the amount of particulate matter entrained in ambient air as a result of anthropogenic fugitive dust sources by requiring actions to prevent, reduce or mitigate fugitive dust emissions.
- SCAQMD Rule 1113, which limits the VOC content of architectural coatings.
- SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

- In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location.

- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

Regional Emissions

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

As stated above, it is mandatory for all construction projects in the Basin to comply with SCAQMD Rule 403 for Fugitive Dust. Rule 403 control requirements include measures to prevent the generation of visible dust plumes. Measures include, but are not limited to, applying water and/or soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system or other control measures to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. Compliance with Rule 403 would reduce regional $PM_{2.5}$ and PM_{10} emissions associated with 5850 Project construction activities by approximately 61 percent.

This analysis also assumes a single-trip haul distance of up to 39.5 miles to the Chiquita Canyon Landfill. However, closer locations may be determined feasible, which would result in lower emissions for the 5850 Project.

As shown in Table 4.3-3, the construction of the 5850 Project would 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 5850 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 4.3-3
Estimated Daily 5850 Project Construction Emissions - Unmitigated

Construction Phase Year	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2020	4	95	34	<1	5	2

Table 4.3-3
Estimated Daily 5850 Project Construction Emissions - Unmitigated

2021	3	19	28	<1	3	1
2022	30	29	43	<1	4	2
Maximum Regional Total	**30**	**95**	**43**	**<1**	**5**	**2**
Regional Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum Localized Total	**29**	**33**	**30**	**<1**	**3**	**2**
Localized Threshold	**N/A**	**186**	**2,961**	**N/A**	**64**	**21**
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels. Assumes implementation of SCAQMD Rule 403 (Fugitive Dust Emissions)
Source: DKA Planning, 2019 based on CalEEMod 2016.3.2 model runs (included in Appendix A).
LST analyses based on 2-acre site with 200-meter distances to receptors in Northwest Coastal LA County source receptor area (SRA). Though the Project Site is approximately 4.53 acres, this analysis conservatively used the thresholds for a smaller site, per SCAQMD guidance. SCAQMD LST thresholds are established for 1, 2, and 5 acres. Reliance on the smaller threshold of 2 acres ensures that the analysis holds the 5850 Project's impacts to a threshold more stringent than would otherwise be the case.

Localized Emissions

In addition to maximum daily regional emissions, maximum localized (on-site) emissions were quantified for each construction activity. The localized construction air quality analysis was conducted using the methodology promulgated by the SCAQMD. Look-up tables provided by the SCAQMD were used to determine localized construction emissions thresholds for the 5850 Project.[13] LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are based on the most recent background ambient air quality monitoring data (2016–2018) for the Project area.

Maximum on-site daily construction emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for the Northwest Coastal LA

[13] SCAQMD, LST Methodology Appendix C-Mass Rate LST Look-up Table, revised October 2009.

County SRA based on construction site acreage that is less than or equal to two acres.[14] Potential impacts were evaluated at the closest off-site sensitive receptor, which would be the residences under construction at the Jefferson & La Cienega (Cumulus) project, approximately 710 feet northeast of the Project Site across Jefferson Boulevard. The closest receptor distance on the SCAQMD mass rate LST look-up tables is 200 meters.

As shown in Table 4.3-3, above, the 5850 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. Similarly, construction activities would not produce PM_{10} and $PM_{2.5}$ emissions that exceed localized thresholds recommended by the SCAQMD.

These estimates assume the use of Best Available Control Measures (BACM) that address fugitive dust emissions of PM_{10} and $PM_{2.5}$ through SCAQMD Rule 403. This would include watering portions of the Project Site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. Therefore, construction impacts on localized air quality are considered less than significant.

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified the following groups who are most likely to be affected by air pollution: children less than 14 years of age; the elderly over 65 years of age; athletes; and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, child care centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. While Jefferson Boulevard is largely a commercial corridor, there are residences and other sensitive receptors in the area. Existing and future sensitive receptors within 1,000 feet of the Project Site include but are not limited to the following:

- Cumulus multi-family residences under construction, 3321 South La Cienega Boulevard; approximately 710 feet northeast of the Project Site.
- Cameo Woods multi-family residences, 3648 Kalsman Drive; approximately 860 feet south of the Project Site.

In addition, there are residential neighborhoods beyond 1,000 feet to the north and east of the Project Site. These include residences east of La Cienega Boulevard approximately 1,060 feet east of the Project Site, as well as single-family homes on Fay Avenue approximately 1,070 feet northwest of the Project Site.

[14] The Project Site is located in the Northwest Coastal LA SRA, one of 37 SRAs in the region. SCAQMD defines an SRA as a geographic area with relatively uniform ambient air quality based on local meteorology, terrain, sources, and other criteria that warrant continuous air quality monitoring.

Construction of the 5850 Project could expose sensitive receptors to substantial pollutant concentrations if maximum daily emissions of regulated pollutants generated by sources located on and/or near the Project Site exceeded the applicable LST thresholds, or if construction activities generated significant emissions of toxic air contaminants (TACs) that could result in carcinogenic risks or non-carcinogenic hazards exceeding the SCAQMD Air Quality Significance Thresholds of 10 excess cancers per million or non-carcinogenic Hazard Index greater than 1.0, respectively. As discussed above, the LST values were derived by the SCAQMD for the criteria pollutants NO_X, CO, PM_{10}, and $PM_{2.5}$ to prevent the occurrence of concentrations exceeding the air quality standards at sensitive receptor locations based on proximity and construction site size.

As shown in Table 4.3-3, during construction of the 5850 Project, maximum daily localized unmitigated emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ from sources on the Project Site would remain below each of the respective LST values. Unmitigated maximum daily localized emissions would not exceed any of the localized standards for receptors that are generally within 200 meters of the 5850 Project's construction activities. Therefore, based on SCAQMD guidance, localized emissions of criteria pollutants would not have the potential to expose sensitive receptors to substantial concentrations that would present a public health concern. It should be noted that Mitigation Measure AQ1 from the Certified EIR calls for contractors to use best management practices that could further reduce criteria pollutant emissions. These BACMs could include but not be limited to using electricity from power poles rather than using diesel-powered generators, using super-compliant VOC coatings, and using materials that do not require painting, as feasible, all of which would further reduce emissions.

The primary TAC that would be generated by construction activities is diesel PM, which would be released from the exhaust stacks of construction equipment. The construction emissions modeling conservatively assumed that all equipment present on the Project Site would be operating simultaneously and continuously throughout most of the day, while in all likelihood this would rarely be the case. Average daily emissions of diesel PM would be less than one pound per day throughout the course of Project construction. Therefore, the magnitude of daily diesel PM emissions, would not be sufficient to result in substantial pollutant concentrations at off-site sensitive receptor locations nearby.

Furthermore, according to SCAQMD methodology, health risks from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 30-year period will contract cancer based on the use of standard risk-assessment methodology. The entire duration of construction activities associated with implementation of the 5850 Project is anticipated to be approximately 30 months, and the magnitude of daily diesel PM emissions will vary over this time period. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period, construction TAC emissions would result in a less than significant impact. Therefore, construction of the 5850 Project would not expose sensitive receptors to substantial diesel PM concentrations, and this impact would be less than significant.

Operation

Operational emissions of criteria pollutants would come from area sources and mobile sources. Area sources include natural gas for space heating and water heating, gasoline-powered landscaping and maintenance equipment, consumer products such as cleaning supplies, and architectural coatings for routine maintenance.

The 5850 Project would also produce long-term emissions to the region primarily from motor vehicles that access the Project Site. The 5850 Project could add up to approximately 2,910 vehicle trips on a peak weekday at the start of operations in 2023.[15] CalEEMod program generates estimates of emissions from energy use based on the land use type and size.

As shown in Table 4.3-4, during operation, the 5850 Project would not exceed the SCAQMD's regional or localized significance thresholds. Therefore, the operational impacts of the 5850 Project on regional and localized air quality are considered less than significant.

Table 4.3-4
Estimated Daily 5850 Project Operations Emissions - Unmitigated

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	8	<1	<1	<1	<1	<1
Energy Sources	<1	1	1	<1	<1	<1
Mobile Sources	6	27	81	<1	25	7
Net Regional Total	**14**	**28**	**82**	**<1**	**25**	**7**
Regional Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Net Localized Total	**8**	**1**	**1**	**<1**	**<1**	**<1**
Localized Significance Threshold	**N/A**	**186**	**2,961**	**N/A**	**16**	**6**
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

Source: DKA Planning, 2019 based on CalEEMod 2016.3.2 model runs (included in Appendix A).
LST analyses based on 2-acre site with 200-meter distances to receptors in Northwest Coastal LA County source receptor area. Though the Project Site is approximately 4.53 acres, this analysis conservatively used the thresholds for a smaller site, per SCAQMD guidance. SCAQMD LST thresholds are established for 1, 2, and 5 acres. Reliance on the smaller threshold of 2 acres ensures that the analysis holds the 5850 Project's impacts to a threshold more stringent than would otherwise be the case.

[15] Gibson Transportation Consulting, "5850 West Jefferson Boulevard Transportation Analysis", June 2020, Appendix F.

Sensitive Receptors

The Project Site would be developed with land uses that are not typically associated with TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, or petroleum refinery uses). The 5850 Project would not include these types of potential industrial manufacturing process sources. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides, etc.) for the proposed office uses would be below thresholds warranting further study under the California Accidental Release Program.

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit TACs. CARB has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective, which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).[16] The SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.[17] Together, the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

The primary sources of potential air toxins associated with 5850 Project operations include DPM from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and to a lesser extent, facility operations (e.g., natural gas fired boilers). However, these activities, and the land uses associated with the 5850 Project, are not considered land uses that generate substantial TAC emissions. It should be noted that the SCAQMD recommends that health risk assessments (HRAs) be conducted for substantial individual sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.[18] Based on this guidance, the 5850 Project would not include these types of land uses and is not considered to be a substantial source of DPM warranting a refined HRA since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, the CARB-mandated ATCM limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than 5 minutes at any given time, which would further limit diesel particulate emissions.

[16] CARB, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.

[17] SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005.

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

As the 5850 Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the 5850 Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

The 5850 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 5850 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 5850 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.[19]

Based on the limited activity of TAC sources, the 5850 Project would not warrant the need for a health risk assessment associated with on-site activities and uses. Therefore, 5850 Project impacts would be less than significant.

Odors

The 5850 Project would not result in activities that create objectionable odors. The 5850 Project is a commercial office project that would not include any land uses typically associated with unpleasant odors and local nuisances (e.g., rendering facilities or dry cleaners). SCAQMD regulations that govern nuisances (i.e., Rule 402, Nuisances) would regulate any occasional odors. As a result, any odor impacts from the 5850 Project would be considered less than significant.

Conclusion

As demonstrated above, the 5850 Project would result in less than significant impacts related to air quality during both construction and operation. The 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Mitigation Measures

While the analysis provided above demonstrates that implementation of the 5850 Project would not require any mitigation measures related to air quality, the 5850 Project would nevertheless implement Mitigation Measure AQ1 from the Certified EIR.

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

4.3.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

The 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR. Instead, the 5850 Project's impacts with respect to air quality were determined to be less than significant, which is less than the significant and unavoidable impacts identified in the Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe air quality impacts than what was analyzed in the EIR.

4.3.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to air quality. No substantial changes in the environment have occurred since certification of the EIR, and no substantial new air quality impacts have been identified within the vicinity of the Project Site that would result in new or more severe significant environmental impacts.

4.3.5 EIR's Mitigation Measures Addressing Impacts

As stated above, the Certified EIR provided Mitigation Measure AQ1 to address impacts with respect to air quality during the construction of specific projects. While the analysis provided above demonstrates that implementation of the 5850 Project would not require any mitigation measures related to air quality, the 5850 Project would nevertheless implement Mitigation Measure AQ1 from the Certified EIR.

4.3.6 Conclusion

Based on the above, no new significant impacts or a substantial increase in previously identified impacts to air quality would occur as a result of the 5850 Project. Therefore, the impacts to air quality as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.4 Biological Resources

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
BIOLOGICAL RESOURCES: Would the project:					
(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less Than Significant	No	No	No	No
(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less Than Significant	No	No	No	No
(c) Have a substantial adverse effect on state or federally-protected wetlands, (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less Than Significant	No	No	No	No
(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?	Less Than Significant With Mitigation	No	No	No	Yes
(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less Than Significant With Mitigation	No	No	No	Yes
(f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Less Than Significant	No	No	No	No

This section is based in part on the Certified EIR and the following item, which is included as **Appendix B** to this Addendum:

B Tree Survey, Land Images Landscape Architecture, August 2019.

4.4.1 Impact Determination in the EIR

The Certified EIR stated that the majority of the West Adams CPA is fully urbanized, containing primarily residential, commercial, and industrial development, although plant and animal habitats still exist, primarily within the Kenneth Hahn State Recreation Area situated in the southwest boundary of the CPA. Most of the Community Plan development would be infill of existing urban spaces, and therefore, these projects are not expected to directly impact candidate, sensitive, or special status plant and animal species or habitats. Similarly, areas which have the capacity for more intense development, like the TOD areas, would not directly impact habitats which are considered significant for candidate, sensitive, or special status species. Furthermore, no changes in land use patterns would occur at the portion of the Kenneth Hahn State Recreation Area that is located within the West Adams CPA. Therefore, the Certified EIR determined that implementation of the Community Plan would result in less than significant impacts related to candidate, sensitive, or special status species.

Ballona Creek is the only significant water course in the West Adams CPA. However, within the CPA, Ballona Creek is a concrete-lined channel that does not support wetland flora or fauna. As the Community Plan did not change land use patterns within the Kenneth Hahn State Recreation Area, and with existing City Codes and regulatory requirements, the Certified EIR determined that implementation of the Community Plan would result in less than significant impacts to riparian habitats and wetlands.

As stated in the Certified EIR, the West Adams CPA does not act as a true wildlife corridor, movement pathway, or linkage of note between larger habitat areas for terrestrial wildlife. However, trees within the West Adams CPA could potentially support migratory birds, which could be impacted during construction activities. Mitigation Measure BR1 would ensure the protection of native nesting birds during construction of a specific project. Therefore, with implementation of Mitigation Measure BR1, the Certified EIR determined that implementation of the Community Plan would result in a less than significant impact related to migratory birds.

Specific development and infrastructure projects also have the potential to result in the loss of protected trees within the West Adams CPA. Mitigation Measure BR2 would ensure projects follow the City of Los Angeles Tree Preservation Ordinance including provisions to either protect in place the existing protected trees in or adjacent to the project site. Therefore, with implementation of Mitigation Measure BR2, the Certified EIR determined that implementation of the Community Plan would result in a less than significant impact related to tree preservation. Currently, there are no species identified within the West Adams CPA that are protected by the Endangered Species Act and thus, no applicable habitat conservation plans are identified for the West Adams CPA. Therefore, the Certified EIR determined that implementation of the Community Plan would result in less than significant impacts related to habitat conservation plans.

Mitigation Measures

The following mitigation measures were included in the Certified EIR to reduce impacts related to biological resources to less than significant:

BR1 Any approval of a Discretionary project or *"Active Change Area Project"* shall ensure that in order to prevent the disturbance of nesting native and/or migratory bird species, all clearing of a project site should take place between September 1 and February 14. If construction is scheduled or ongoing during bird nesting season (February 15 to August 31), qualified biologists shall survey the area within 200 feet (or up to 300 feet, depending on topography or other factors, and 500 feet for raptors) of the construction activity to determine if construction would disturb nesting birds. If nesting activity is being compromised, construction shall be suspended in the vicinity of the nest until fledging is complete. This mitigation measure shall be implemented by a qualified biologist under contract with the project applicant(s). The project biologist should prepare a report detailing the results of the construction monitoring efforts. The report should be submitted to the California Department of Fish and Wildlife (CDFW) within two months of the completion of the monitoring activities.

BR2 Any approval of a Discretionary project or *"Active Change Area Project",* shall ensure that during the final design phase of the proposed project, and prior to the start of the demolition/construction phase, the project applicant shall submit a final landscape plan to the City of Los Angeles for approval by the City's Chief Forester and the Director of the Bureau of Street Services. The final landscape plan shall include provisions to either protect in place the existing protected trees in or adjacent to the project site, per the requirements of the City of Los Angeles Tree Preservation Ordinance.

4.4.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Project Site currently contains a surface parking lot and an existing media production building, and the 5850 Project would develop an approximately 344,947 square foot office building in place of the existing surface parking lot. As stated above, the majority of the CPA is fully urbanized. As the Project Site is currently fully developed, development of the 5850 Project would not result in the removal of any habitat. Further, the 5850 Project would not alter land use patterns at the portion of the Kenneth Hahn State Recreation Area that is located within the West Adams CPA. Therefore, the 5850 Project would not result in new significant impacts related to candidate, sensitive, or special status species.

In addition, there are no riparian areas located on or adjacent to the Project Site. While the Ballona Creek is located west of the Project Site across Jefferson Boulevard, it is not identified by the US National Wetlands Inventory as Riparian. Therefore, the 5850 Project would result in no impact with respect to riparian habitats.

There are no wetlands or water features on the Project Site. While the Ballona Creek is located west of the Project Site across Jefferson Boulevard, it is a channelized area completely

surrounded by urban uses, including light industrial and commercial uses. Further, as stated in the Certified EIR, the Ballona Creek does not support wetland flora or fauna. Therefore, the 5850 Project would have a less than significant impact with respect to wetlands.

As stated in the Certified EIR, the West Adams CPA does not act as a true wildlife corridor, movement pathway, or linkage of note between larger habitat areas for terrestrial wildlife. However, trees on the Project Site could potentially support migratory birds, which could be impacted during construction activities. Mitigation Measure BR1 from the Certified EIR would ensure the protection of native nesting birds during construction of the 5850 Project. Therefore, with implementation of Mitigation Measure BR1, the 5850 Project would result in a less than significant impact with respect to migratory birds.

The tree survey prepared for the Project Site (included in Appendix B) shows the existing trees located on the Project Site and notes whether they would be removed or preserved as a result of the 5850 Project. As shown, the 5850 Project would result in the removal of 17 *Koelreutaria Bipinata* trees that are over eight inches in diameter breast height (DBH). These trees would be replaced in accordance with the existing tree replacement requirements of the City's Division of Urban Forestry. As stated on the tree survey, there are no City of Los Angeles protected trees located on the Project Site. As the 5850 Project would not remove any protected trees (as none are located on the Project Site), Mitigation Measure BR2 from the Certified EIR would not apply to the 5850 Project. Therefore, the 5850 Project would not conflict with any tree preservation policy or ordinance and impacts would be less than significant.

Finally, as stated in the Certified EIR, there are no species identified within the West Adams CPA that are protected by the Endangered Species Act, and thus, no applicable habitat conservation plans are identified for the West Adams CPA. Therefore, the 5850 Project would also result in a less than significant impact related to habitat conservation plans.

Mitigation Measures

The 5850 Project would implement and comply with Mitigation Measure BR1 from the Certified EIR. Mitigation Measure BR2 is not applicable to the 5850 Project, as there are no City of Los Angeles protected trees on the Project Site.

4.4.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

The 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.4.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to biological resources. No substantial changes in the environment related to biological resources

have occurred since certification of the EIR, and no substantial new biological resources have been identified within the vicinity of the 5850 Project that would result in new or more severe significant environmental impacts.

4.4.5 Mitigation Measures Addressing Impact

As stated above, the 5850 Project would implement and comply with Mitigation Measure BR1 from the Certified EIR.

4.4.6 Conclusion

Based on the above, no new significant impacts to biological resources or a substantial increase in previously identified biological resource impacts would occur as a result of the 5850 Project. Therefore, the adoption of the 5850 Project does not meet the conditions for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.5 Cultural Resources

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
CULTURAL RESOURCES: Would the project:					
(a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?	Less Than Significant With Mitigation	No	No	No	No
(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?	Less Than Significant With Mitigation	No	No	No	Yes
(c) Disturb any human remains, including those interred outside of formal cemeteries?	Less Than Significant With Mitigation	No	No	No	Yes

4.5.1 Impact Determination in the EIR

The Certified EIR stated that there are various City, State, and federally-designated historical resources in the West Adams CPA, including Historic-Cultural Monuments (HCMs) and Historic Preservation Overlay Zones (HPOZs). The Community Plan contains numerous policies and programs to protect significant historic resources and does not include modifications to historical resources or historic districts in the West Adams CPA. Development that would occur under the Community Plan has the potential to occur near or adjacent to designated historical resources, as well as on properties that are eligible for designation as historical resources, which could impact historical resources either through direct effects to historical resources, or through indirect effects to the area surrounding a resource. Mitigation Measures CR1 through CR3 would reduce impacts to historical resources. Therefore, with implementation of Mitigation Measures CR1 through CR3, the Certified EIR determined that the Community Plan would result in a less than significant impact related to historical resources.

As stated in the Certified EIR, the West Adams CPA is highly disturbed and any archaeological resources that may have existed at the surface have likely been disturbed by past development. However, according to the Certified EIR, there is reasonable potential that the development that would occur under the Community Plan would be located on a site with previously unknown archaeological resources. Mitigation Measures CR4 through CR8 would reduce impacts to archaeological resources. Therefore, with implementation of Mitigation Measures CR4 through CR8, the Certified EIR determined that implementation of the Community Plan would result in a less than significant impact related to archaeological resources. As stated in the Certified EIR, the potential to disturb any human remains interred outside of formal cemeteries within the West

Adams CPA is considered low, given the level of past human activity. However, it is possible that unknown human remains could be located on sites developed under the Community Plan. Mitigation Measure CR10 would reduce impacts to human remains. Therefore, with implementation of Mitigation Measure CR10, the Certified EIR determined that implementation of the Community Plan would result in a less than significant impact related to human remains.

Mitigation Measures

The following mitigation measures were included in the Certified EIR to reduce impacts related to cultural resources to less than significant:

CR1 Before approval of a Discretionary project or *"Active Change Area Project"* involving properties designated as Historic-Cultural Monuments or listed in or determined eligible for the National Register or California Register, the project shall be reviewed by the Department of City Planning Office of Historic Resources.

CR2 Before approval of any building permits for a Discretionary project or *"Active Change Area Project",* developed in a Historic Preservation Overlay Zones, the City shall require written approval from the Department of City Planning Office of Historic Resources.

CR3 Before approval of a Discretionary project or *"Active Change Area Project",* involving properties identified in the SurveyLA Historic Resources Survey Report: *"West Adams – Baldwin Hills – Leimert Community Plan Area"* as eligible for listing, the City of Los Angeles Office of Historic Resources (OHR) shall find that the project is consistent with the U.S. Secretary of the Interior's Standards for Rehabilitation or that upon further review or study, the property is not eligible for designation as a historic resource.

CR4 Any approval of a Discretionary project or *"Active Change Area Project"* shall ensure that prior to excavation and construction on a proposed project site, the project applicant shall perform a cultural resources literature and records search by an institution recognized and approved by the City of Los Angeles Planning Department to assess the potential for the proposed project site to contain sensitive protected cultural resources.

CR5 Any approval of a Discretionary project or *"Active Change Area Project"* shall ensure that prior to excavation and construction on a proposed project site, the prime construction contractor and any subcontractor(s) shall be cautioned on the legal and/or regulatory implications of knowingly destroying cultural resources or removing artifacts, human remains, bottles, and other cultural materials from the proposed project site.

CR6 Any approval of a Discretionary project or *"Active Change Area Project"* shall ensure that if during any phase of project construction any cultural materials are encountered, construction activities within a 50-meter radius shall be halted immediately, and the project applicant shall notify the City. A qualified prehistoric archaeologist (as approved by the City) shall be retained by the project applicant and shall be allowed to conduct a

more detailed inspection and examination of the exposed cultural materials. During this time, excavation and construction would not be allowed in the immediate vicinity of the find. However, those activities could continue in other areas of the project site.

CR7 Any approval of a Discretionary project or *"Active Change Area Project"* shall ensure that if any find were determined to be significant by the archaeologist, the City and the archaeologist would meet to determine the appropriate course of action.

CR8 Any approval of a Discretionary project or *"Active Change Area Project"* shall ensure that all cultural materials recovered from the site would be subject to scientific analysis, professional museum curation, and a report prepared according to current professional standards.

CR9[20] Any approval of a Discretionary project or *"Active Change Area Project"* shall ensure that during excavation and grading, if paleontological resources are uncovered, all work in that area shall cease and be diverted so as to allow for a determination of the value of the resource. Construction activities in that area may commence once the uncovered resources are collected by a paleontologist and properly processed. Any paleontological remains and/or reports and surveys shall be submitted to the Los Angeles County Natural History Museum.

CR10 Any approval of a Discretionary project or *"Active Change Area Project"* shall ensure that if human remains are unearthed at a project site during construction, work at the specific construction site at which the remains have been uncovered shall be suspended, and the City of Los Angeles Public Works Department and County coroner shall be immediately notified. No further disturbance shall occur until the Los Angeles County Coroner has made the necessary findings as to origin and disposition in accordance with California Health and Safety Code Section 7050.5. If the remains are determined to be those of a Native American, the Native American Heritage Commission (NAHC) in Sacramento shall be contacted before the remains are removed in accordance with Section 21083.2 of the California Public Resources Code.

4.5.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Project Site currently contains a surface parking lot and an existing media production building that was built in 2017, and that would remain on-site. The 5850 Project would develop an approximately 344,947 square foot office building in place of the existing surface parking lot. The Project Site is not located within a Historic Preservation Overlay Zone, nor was the Project

[20] Mitigation Measure CR9 was provided in the Cultural Resources section of the Certified EIR. However, as a result of the changes to the CEQA Guidelines described previously in Section 3 of this Addendum, the issue of paleontological resources is now addressed within the Geology and Soils section. Therefore, for the 5850 Project, Mitigation Measure CR9 is discussed under Geology and Soils, further below.

Site identified in SurveyLA. Therefore, development of the 5850 Project would not result in any impacts with respect to historic resources.

The 5850 Project would be located in an urbanized area on a Site that has been previously developed. While unlikely, it is possible that unknown archaeological resources or human remains could exist at the Project Site and could be encountered during excavation for the four proposed subterranean parking levels. Therefore, the 5850 Project would be subject to Mitigation Measures CR4 through CR8, which would minimize impacts in the event archaeological resources are encountered during construction. In addition, the 5850 Project would also implement Mitigation Measure CR10, which would minimize impacts in the event any human remains are encountered during construction. Implementation of Mitigation Measures CR4 through CR8, and CR10, would ensure that the 5850 Project's impacts with respect to archaeological resources and human remains are less than significant. Therefore, the 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Mitigation Measures

The 5850 Project would implement Mitigation Measures CR4 through CR8, and CR10, from the Certified EIR. Mitigation Measure CR3 is not applicable to the 5850 Project, as the Project Site has not been identified in SurveyLA. Based on changes to the CEQA Guidelines, described previously in Section 3 of this Addendum, the issue of paleontological resources is now addressed as part of the Geology and Soils analysis. Therefore, the discussion of Mitigation Measure CR9 as it relates to the 5850 Project has been provided under Geology and Soils, further below.

4.5.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

The 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.5.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to cultural resources. No substantial changes in the environment related to cultural resources have occurred since certification of the EIR, and no substantial new cultural resources have been identified within the vicinity of the 5850 Project that would result in new or more severe significant environmental impacts.

4.5.5 Mitigation Measures Addressing Impact

As stated above, the 5850 Project would implement Mitigation Measures CR4 through CR8, and CR10, from the Certified EIR. Implementation of these measures would ensure that the 5850 Project's impacts with respect to archaeological resources and human remains are less than significant. No additional mitigation measures are required.

4.5.6 Conclusion

Based on the above, no new significant impacts to cultural resources or a substantial increase in previously identified cultural resource impacts would occur as a result of the 5850 Project. Therefore, the adoption of the 5850 Project does not meet the conditions for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.6 Energy

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
ENERGY: Would the project:					
(a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less Than Significant	No	No	No	No
(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less Than Significant	No	No	No	No

4.6.1 Impact Determination in the EIR

As stated in the Certified EIR, the Community Plan's estimated additional fuel consumption represents less than one percent of petroleum fuel demand in 2008 within Los Angeles County. In addition, the Community Plan includes many beneficial elements aimed to encourage alternative modes of travel, such as the creation of more pedestrian friendly environments around transit stations and the provision of bicycle facilities along major corridors. Moreover, the Community Plan increases development near TOD areas. Accordingly, this reduces automobile reliance and related fuel consumption by providing housing opportunities for the community within close proximity to transit, as well as local-serving businesses, employment opportunities and retail. Therefore, the Certified EIR determined that implementation of the Community Plan would result in a less than significant impact related to petroleum.

The Certified EIR states there is no need for new (off-site) electrical generation facilities or major enhancements to accommodate the Community Plan. Moreover, additional electricity required by the development contemplated in the Community Plan would not exceed the electricity generation potential of the Los Angeles Department of Water and Power (LADWP) or the capacity of the distribution infrastructure. New development occurring from buildout of the Community Plan would be subject to Title 24, Part 6 of the California Administrative Code, the Energy Efficiency Standards for Residential and Nonresidential Buildings, and the City of Los Angeles' Green Building Code Energy Efficiency requirements. Consequently, as projects are built within the West Adams CPA, they will be in compliance with all applicable energy conservation plans and policies of the City. Therefore, the Certified EIR determined that implementation of the Community Plan would result in less than significant impacts related to electricity.

Regarding natural gas, the Certified EIR states that development contemplated in the

Community Plan would consume less than 0.01 percent of SoCalGas' 2030 projected available supply. Therefore, the Certified EIR concluded that implementation of the Community Plan would result in less than significant impacts related to natural gas.

Mitigation Measures

Impacts related to energy were determined to be less than significant. Therefore, no mitigation measures were required.

4.6.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The 5850 Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the electricity and natural gas demand for the 5850 Project were accounted for within the analysis contained in the Certified EIR. Consistent with the Certified EIR, the 5850 Project would be served by LADWP and SoCalGas supplies, which have an obligation to serve the Project Site. Further, the 5850 Project would not change or increase the permitted square footage for the Project Site beyond what was analyzed in the Certified EIR. As shown in Table 4.6-1, the 5850 Project would result in a projected on-site demand for electricity totaling approximately 6,700,830 kilowatt hours (kWh) per year, approximately 6,701 megawatt hours (mWh) per year, or approximately 18,358 kWh per day.

Table 4.6-1
5850 Project Electricity Demand

Land Use	Total (kWh/yr)[1]
Office	4,572,480
Enclosed Parking with Elevator	2,128,350
Project Total	**6,700,830**

sf =square feet kWh = kilowatt-hour yr = year
[1] Calculated via CalEEMod. Refer to Appendix A.
Note: LADWP does not provide or comment on generation rates to provide an estimate of demand.

Based on LADWP's 2016 Power Integrated Resource Plan, LADWP forecasts that its total energy sales in the 2022–2023 fiscal year (the 5850 Project's buildout year) will be 24,403 GWh of electricity.[21,22] As such, the Project-related net increase in annual electricity consumption of approximately 6,701 MWh per year would represent approximately 0.02 percent of LADWP's projected sales in 2022-2023. Thus, there is adequate supply capacity to serve the Project. Therefore, the LADWP's current and planned electricity supplies would be sufficient to support

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

[22] LADWP, 2016 Power Integrated Resource Plan, January 2017, Appendix A.

the 5850 Project's electricity consumption. The 5850 Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the LADWP. Further, the 5850 Project would be in compliance with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code. Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.[23] It should also be noted that the 5850 Project's estimated electricity consumption is based on usage rates that do not account for the 5850 Project's energy conservation features or updates to the Los Angeles Building Code. This represents a conservative (worst-case scenario) approach. Therefore, actual electricity consumption from the 5850 Project would likely be lower than that forecasted. Based on the above analysis, the 5850 Project's impacts related to the consumption of electricity would be less than significant.

As shown in Table 4.6-2, the 5850 Project would result in a projected on-site demand for natural gas totaling approximately 3,664,320 kBTU per year (or 3,571,462 cubic feet [cf] per year, assuming 1 cf = 1.026 kBTU), or approximately 10,039 kBTU per day (9,785 cf per day). Based on the 2016 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2,456 million cf per day in 2025 (the closest subsequent year to the 5850 Project's 2023 buildout year).[24] The 5850 Project would account for approximately 0.0004 percent of the 2025 forecasted consumption in SoCalGas' planning area, and thus there would be adequate supply to serve the 5850 Project.

Table 4.6-2
5850 Project Natural Gas Demand

Land Use	Total (kBTU/yr)[1]
Office	3,664,320
Enclosed Parking with Elevator	0
Project Total	**3,664,320**

sf =square feet kBTU = 1,000 British thermal units yr = year
1 Calculated via CalEEMod. Refer to Appendix A.
Note: SoCalGas does not provide or comment on generation rates to provide an estimate of demand.

The 5850 Project operation would result in the irreversible consumption use of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. The 5850 Project would be in compliance with the City's Green Building Ordinance and would thus exceed the standards in Title 24 of the CCR requiring building energy efficiency standards. Therefore, because of energy efficient design features,

[23] LADWP Rules Governing Water and Electric Service: http://netinfo.ladbs.org/ladbsec.nsf/d3450fd072c7344c882564e5005d0db4/0476e63f972b28e288256b79007c417d/$FILE/Rule%2016-d.pdf.

[24] California Gas and Electric Utilities, 2016 California Gas Report, p. 97.

compliance with the Green Building Ordinance, adequate projected supply and the obligation of SCG to service the Project Site, 5850 Project impacts related to natural gas would be less than significant.

Therefore, the 5850 Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

Mitigation Measures

None required.

4.6.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

The 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.6.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to energy. No substantial changes in the environment related to energy have occurred since certification of the EIR. Finally, as it has been determined the 5850 Project will not result in any significant energy impacts, a review of feasible mitigation measures is not required.

4.6.5 Mitigation Measures Addressing Impact

Because the Certified EIR determined that the Project would have less than significant impacts with respect to energy, no mitigation measures were required. The 5850 Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.6.6 Conclusion

Based on the above, no new significant impacts to energy or a substantial increase in previously identified energy impacts would occur as a result of the 5850 Project. Therefore, the adoption of the 5850 Project does not meet the conditions for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.7 Geology and Soils

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
GEOLOGY AND SOILS: Would the project:					
(a) Directly or indirectly cause potential substantial adverse effects, including the risk or 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?	Less Than Significant	No	No	No	No
(ii)Strong seismic ground shaking?	Less Than Significant	No	No	No	No
(iii) Seismic-related ground failure, including liquefaction?	Less Than Significant	No	No	No	No
(iv) Landslides?	Less Than Significant	No	No	No	No
(b) Result in substantial soil erosion or the loss of topsoil?	Less Than Significant	No	No	No	No
(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less Than Significant	No	No	No	No
(d) Be located on expansive soil, as defined in Table 18- 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less Than Significant	No	No	No	No
(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	No	No	No	No
(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less Than Significant With Mitigation	No	No	No	Yes

This section is based on the Certified EIR and the following items, which are included as **Appendix C** to this Addendum:

C-1 Geotechnical Engineering Update Study, Advanced Geotechnical Services, Inc., November 20, 2014.

C-2 Geology and Soils Report Approval Letter, Department of Building and Safety, May 13, 2015.

C-3 Surface Fault Rupture Hazard Investigation, Wood Environment & Infrastructure Solutions, Inc., January 16, 2020.

C-4 Geology Report Approval Letter, Department of Building and Safety, February 4, 2020.

4.7.1 Impact Determination in the EIR

Construction

The Certified EIR stated that construction related to implementation of the Community Plan would not affect seismicity. However, implementation of the Community Plan involves new construction, which would result in an increase in grading and subsequent erosion and loss of topsoil within the West Adams CPA. The Los Angeles Building Code includes specific requirements addressing seismic design, site grading, foundation design, cut and fill slope design, soil expansion, geologic investigations and reports before and during construction, retaining walls, soil and rock testing, basement walls, shoring of adjacent properties, potential primary and secondary seismic effects, and groundwater. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code. All earthwork and grading activities associated with the Community Plan would require grading permits from LADBS that include requirements and standards designed to limit potential impacts related to soil erosion, unstable soils, and expansive soils. Implementation of the City's codes, regulatory requirements, standard grading and building permit requirements, and the application of Best Management Practices (BMPs), would ensure that potential impacts from erosion or loss of topsoils, unstable soils, and expansive soils would be less than significant during construction. As stated in the Certified EIR, the West Adams CPA is currently served by City-owned wastewater treatment and disposal facilities and does not utilize a septic system. Therefore, no impacts related to septic tanks would occur.

As stated in the Certified EIR, the West Adams CPA is highly disturbed and any paleontological resources that may have existed at the surface have likely been disturbed by past development. However, according to the Certified EIR, there is reasonable potential that the development that would occur under the Community Plan would be located on a site with previously unknown paleontological resources. Mitigation Measure CR9 would reduce impacts to paleontological resources. Therefore, with implementation of Mitigation Measure CR9, the Certified EIR determined that implementation of the Community Plan would result in a less than significant impact related to paleontological resources.

Operation

The Certified EIR noted that small areas along the southwestern boundary of the West Adams CPA have been mapped as Alquist-Priolo Earthquake Fault Zones. Specifically, the proposed Jefferson and La Cienega TOD Subarea is located within an Alquist-Priolo Earthquake Fault Zone. The Certified EIR stated that the increased intensity of development within certain portions of the West Adams CPA would result in a greater number of people exposed to potential seismic hazards. However, any new structures constructed within the West Adams CPA would be required to comply with the seismic safety guidelines in the City's General Plan Safety Element, as well as the seismic safety requirements in the CBC and the City of Los Angles Building Code. In addition, redevelopment would likely result in the replacement of old buildings that are not built to current seismic standards with new buildings that meet the most recent building codes and regulations, reducing the risk of loss, injury or death as a result of seismic activity. Therefore, the Certified EIR determined that implementation of the Community Plan would result in less than significant impacts related to fault rupture and ground shaking. As stated in the Certified EIR, prior to construction of new structures in liquefaction-prone areas, a site-specific geotechnical evaluation is required that would specifically address and include measures to minimize liquefaction. Any new development under the Community Plan would comply with the recommendations identified in the geotechnical evaluation, as well as the City of Los Angeles Building and Grading Codes and any specific requirements established by the Department of Public Works and/or the City Engineer. Therefore, the Certified EIR determined that implementation of the Community Plan would result in less than significant impacts related to liquefaction. Portions of the West Adams CPA that are susceptible to landslides have not been identified as areas of change under the Community Plan. Therefore, under the Community Plan, no impacts related to landslides would occur. Finally, the West Adams CPA is currently served by City- owned wastewater treatment and disposal facilities and does not utilize a septic system. Therefore, no impacts related to septic tanks would occur with implementation of the Community Plan.

Mitigation Measures

The following mitigation measure was included in the Certified EIR to reduce impacts related to paleontological resources to less than significant:[25]

CR9 Any approval of a Discretionary project or *"Active Change Area Project"* shall ensure that during excavation and grading, if paleontological resources are uncovered, all work in that area shall cease and be diverted so as to allow for a determination of the value of the resource. Construction activities in that area may commence once the uncovered resources are collected by a paleontologist and properly processed. Any paleontological

[25] Mitigation Measure CR9 was provided in the Cultural Resources section of the Certified EIR. However, as a result of the changes to the CEQA Guidelines described previously in Section 3 of this Addendum, the issue of paleontological resources is now addressed within the Geology and Soils section.

remains and/or reports and surveys shall be submitted to the Los Angeles County Natural History Museum.

4.7.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Seismic Hazards

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

According to the Geotechnical Engineering Update Study prepared for the Project Site (included in Appendix C-1), the Project Site is located within an Alquist-Priolo Fault Zone associated with the Newport Inglewood Fault. Based on the Project Site's location within an Alquist-Priolo Fault Zone, a Surface Fault Rupture Hazard Investigation was also prepared for the Project Site (included in Appendix C-3). The purpose of the additional fault-rupture study was to evaluate the potential for surface rupture from faulting at the Project Site,

The Project Site is within the Ballona Gap of the Los Angeles Basin, approximately one-half mile north of the Baldwin Hills. Several subsurface geotechnical investigations have been previously performed at the Project Site. A geotechnical investigation was performed in 2001, and included 9 rotary wash borings ranging from 15 to 50 feet in depth and 9 Cone Penetrometer Tests (CPTs) ranging in depth from 15 to 50 feet. A second subsurface geotechnical investigation was performed in 2003, and included 6 rotary wash borings ranging in depth from 20 to 50 feet and 10 CPTs ranging in depth from 30 to 50 feet. Fault rupture assessments were performed in 2004, 2014, and 2015. In total, one continuous core boring 55 feet in depth and 25 CPTs ranging in depth from 7 to 75 feet were excavated as part of the these fault rupture assessments. For the additional fault rupture study (included in Appendix C-3), an additional four continuous core borings were installed to depths 100 feet below ground surface (bgs) and two continuous core borings were installed to depths 60 feet bgs. Based on the current and prior borings, the Project Site is underlain by artificial fill, alluvium, and Inglewood Formation bedrock. The artificial fill on-site ranges in thickness from a few feet to 30 feet, and consists of mixtures and layers of sand, silt, and chunks of bedrock material. The artificial fill is presumed to have been placed primarily during infilling of the historic Ballona Creek channel. The encountered alluvial deposits consist of silty sand, sand, and silt. Gravels are present locally and at the base of the alluvium in some of the current and prior continuous core borings. The Inglewood Formation bedrock is a marine very fine sandy siltstone with local fine thin sand and clayey beds. The bedrock is predominantly thin bedded to laminated with some fine scale cross

bedding. The bedrock is intact with no fracturing evident other than mechanical (induced during the coring process).

A basal sand and gravel in the alluvium above the bedrock contact at an elevation of 70 to 78.5 feet (referred to as the 75 foot gravel) has been identified in the borings and CPTs in the south central and southeastern portions of the Project Site. The top of the bedrock elevations in the north central and western portions of the Project Site are deeper than the 75 foot gravel erosional surface. The contours of the Project Site delineate a northeast-southwest trending channel structure at elevation 52 to 55 feet (referred to as 52-55 foot gravel), with risers, or side slopes, passing upward through elevations 61 to 66 feet. The base of alluvial gravels/top of the bedrock represents two separate paleogeomorphic surfaces of different ages. The 52-55 foot gravel is interpreted to represent an LA River paleochannel trending northwest-southeast across the Project Site and continuing to the east-northeast, based on elevations on the top of bedrock. The 75 foot gravel is present across the remainder of the Project Site, and is inferred to be Holocene age, based on the lack of a soil developed in them and because they incise older topography. The terrace rise associated with the 52-55 foot gravel shows a northeast linear trend across the Project Site, which demonstrates the absence of a major fault crossing the Site, as the Inglewood Fault, if there, would have offset this riser in a recognizable way. According to Wood Environment & Infrastructure Solutions, these observations demonstrate that the Inglewood Fault must lie to the southwest of the Project Site. The Grading Division of LADBS reviewed the Surface Fault Rupture Hazard Investigation and provided a Geology Report Approval Letter approving the report acceptable (see approval letter contained in Appendix C-4 of this Addendum). Therefore, the 5850 Project's impacts with respect to surface rupture would be less than significant.

The Project Site is located in the seismically active Southern California region. Given the Project Site's location in a seismically active region, the Project Site could experience seismic groundshaking in the event of an earthquake. However, as with any new development in the State of California, building design and construction for the 5850 Project would be required to conform to the current seismic design provisions of the California Building Code. The 2016 California Building Code incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program to minimize losses from an earthquake and provide for the latest in earthquake safety. Additionally, construction of the 5850 Project would be required to adhere to the seismic safety requirements contained in the LABC, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. The 5850 Project consists of an office development and does not include any characteristics that would result in the exacerbation of existing environmental conditions with regard to seismic ground shaking. Adherence to current building codes and engineering practices would ensure that the 5850 Project would not expose people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region, and would minimize the potential to expose people or structures to substantial risk, loss, or injury. Based on the above, development of the 5850 Project would not exacerbate

seismic conditions on the Project Site. With compliance with existing regulatory requirements, 5850 Project impacts associated with seismic ground shaking would be less than significant.

The Project Site is located in an area designated as potentially liquefiable on the *Seismic Hazard Zones* maps of the Hollywood and Beverly Hills Quadrangles. A liquefaction analysis of the earth materials within the Project Site was performed in 2005, as part of a previous geotechnical investigation. That analysis determined that the earth materials underlying the Project Site would not be considered liquefiable. The geotechnical investigation included in Appendix C-1 (November 2014) notes that some of the criteria for liquefaction analysis changed in 2008, and states that the revised fine grained soil criteria and ground accelerations would not affect the previous liquefaction determination for the Project Site. Therefore, the soils underlying the Project Site would not be considered liquefiable and the 5850 Project's impacts with respect to liquefaction would be considered less than significant.

Landslides

As stated in the Geotechnical Engineering Update Study (included as Appendix C-1 of this Addendum), the Project Site is relatively flat with an estimated three to four feet of elevation difference across the Project Site. In addition, the Project Site is not identified by ZIMAS as being located within a landslide hazard zone. Therefore, potential impacts associated with landslides would be less than significant.

Erosion

The Project Site is completely developed with impervious surfaces, including the existing commercial building and surface parking lot. During the 5850 Project's construction phase, activities such as excavation for the four subterranean parking levels, grading, and site preparation could leave soils at the Project Site susceptible to soil erosion. The Project would be required to comply with SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the Project Site, as well as prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during 5850 Project construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all 5850 Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with

these existing regulations, the 5850 Project would not result in any significant impacts related to soil erosion during the construction phase. Therefore, with compliance with applicable regulatory requirements, development of the 5850 Project would not cause or exacerbate soil erosion or loss of topsoil, and impacts regarding soil erosion or the loss of topsoil would be less than significant.

Soil Stability

As discussed previously, the soils underlying the Project Site are considered liquefiable. In addition, the Project Applicant would be required by LADBS, as part of the permitting process, to prepare (or have prepared) a Final Geotechnical Investigation that would confirm the building standards and recommendations that shall be followed in order to construct the proposed structure in accordance with building standards that apply to building within the types of soils found at the Project Site, including areas prone to geologic or soil instability. Through compliance with the LABC and recommendations included in the Final Geotechnical Report, impacts related to geologic and soil instability would be less than significant.

Septic Tanks

As stated in the Certified EIR, the West Adams CPA is currently served by City-owned wastewater treatment and disposal facilities and does not utilize a septic system. The 5850 Project would connect to the City's existing sewer system and would not require the use of septic tanks for alternative wastewater disposal systems. Thus, the 5850 Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems. Therefore, no impacts related to this issue would occur as a result of the 5850 Project.

Paleontological Resources

The 5850 Project would be located in an urbanized area on a Site that has been previously developed. While unlikely, it is possible that unknown paleontological resources could exist at the Project Site and could be encountered during excavation for the four proposed subterranean parking levels. Therefore, the 5850 Project would be subject to Mitigation Measure CR9, which would minimize impacts in the event paleontological resources are encountered during construction. Implementation of Mitigation Measure CR9 would ensure that the 5850 Project's impacts with respect to paleontological resources are less than significant. Therefore, the 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Mitigation Measures

The 5850 Project would implement Mitigation Measure CR9 from the Certified EIR.

4.7.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

The 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.7.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to geology and soils. No substantial changes in the environment related to geology and soils have occurred since certification of the EIR, and no areas that are susceptible to geology and soil impacts have been identified within the vicinity of the Project Site that would result in new or more severe significant environmental impacts.

4.7.5 Mitigation Measures Addressing Impacts

As stated above, the 5850 Project would implement Mitigation Measure CR9 from the Certified EIR. Implementation of this measure would ensure that the 5850 Project's impacts with respect to geology and soils (paleontological resources) are less than significant. No additional mitigation measures are required.

4.7.6 Conclusion

Based on the above, no new significant geology and soils impacts or a substantial increase in previously identified geology and soils impacts would occur as a result of the 5850 Project. Therefore, the impacts to geology and soils as a result do not meet the standards for a subsequent or supplemental EIR pursuant to Public Resources Code, Section 21166 or CEQA Guidelines, Section 15162.

4.8 Greenhouse Gas Emissions

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
GREENHOUSE GAS EMISSIONS: Would the project:					
(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Significant and Unavoidable	No	No	No	No
(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Significant and Unavoidable	No	No	No	No

This section is based on the Certified EIR and the following item, which is included as **Appendix A** to this Addendum:

A Air Quality and Greenhouse Gas Technical Modeling, DKA Planning, August 2019.

4.8.1 Impact Determination in the EIR

Construction

The Certified EIR stated that implementation of the Community Plan could result in a number of construction projects occurring simultaneously every year. According to the Certified EIR, strong economic years would typically lead to increased development projects and above average emissions. Conversely, weak economic years would experience fewer projects and below average emissions. In addition, equipment emissions would decrease in future years as engines become more efficient under new regulations. Construction-related greenhouse gas (GHG) emissions cannot be avoided during construction of any project. The new Community Plan does not increase construction GHG emissions beyond what is anticipated for construction GHG emissions under the prior Community Plan. Therefore, the Certified EIR determined that implementation of the Community Plan would result in a less than significant impact related to construction-related GHG emissions. In addition, as stated in the Certified EIR, the Community Plan would not impede implementation of GHG reducing measures. Therefore, the Certified EIR determined that implementation of the Community Plan would result in a less than significant impact related to applicable construction plans, policies, and regulations.

Operation

According to the Certified EIR, long-term project emissions would be generated by on-road vehicles, general electricity use, water-related electricity use, wastewater management, solid

waste decomposition, and natural gas use. The Certified EIR stated that the increase in emissions would have the potential to interfere with implementation of the ClimateLA plan, and subsequently could interfere with the State's ability to meet its goals under AB 32. Therefore, without mitigation, the Certified EIR determined that implementation of the Community Plan would result in a significant impact related to operational GHG emissions. Moreover, the Community Plan's overall growth in population and development results in higher total emissions that would interfere with GHG reduction plans. Therefore, without mitigation, the Certified EIR determined that implementation of the Community Plan would also result in a significant operational impact related to GHG plans, policies, and regulations. Mitigation Measure GHG1 was provided to reduce greenhouse gas emissions during operation of future developments. Nonetheless, the Certified EIR concluded that impacts related to greenhouse gas emissions and applicable plans, policies, and regulations would remain significant and unavoidable.

Mitigation Measures

GHG1 Any approval of a Discretionary project or *"Active Change Area Project"* shall ensure that the following greenhouse gas reduction measures are incorporated into the project design:

- Install energy efficient lighting (e.g., light emitting diodes), heating and cooling systems, appliances, equipment, and control systems).
- Install light colored "cool" roofs and cool pavements.
- Create water-efficient landscapes.
- Install water-efficient fixtures and appliances.

4.8.2 Do Proposed Changes Involve New Significant Impacts?

The 5850 Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the 5850 Project's impacts with respect to greenhouse gas emissions were accounted for within the analysis contained in the Certified EIR.

Consistency with Applicable Plans and Policies

The discussion below describes the extent to which the 5850 Project complies with or exceeds the performance-based standards included in the regulations outlined in the *Climate Change Scoping Plan*, the 2016–2040 RTP/SCS, the LA Green Plan, and the Sustainable City pLAn. As shown herein, the 5850 Project would be consistent with the applicable GHG reduction plans and policies. The analysis provided further below (see specifically Tables 4.8-5 and 4.8-6) quantifies GHG emissions from construction and operation of the 5850 Project and addresses CEQA Guidelines question (a) regarding whether GHG emissions would directly or indirectly have a significant impact on the environment.

Statewide: Climate Change Scoping Plan

The goal to reduce GHG emissions to 1990 levels by 2020 (Executive Order S-3-05) was codified by the Legislature as the 2006 Global Warming Solutions Act (AB 32). In 2008, CARB approved a *Climate Change Scoping Plan* as required by AB 32 that has been updated over time to reflect updated strategies.[26] In 2014, CARB approved the First Update to the Climate Change Scoping Plan, calling out key priorities for near-term 2020 emission reduction goals, and evaluating how to align the long-term term GHG goals with other resource priorities like water, waste, and transportation. Subsequently, SB 32 was approved in 2016, calling for deeper GHG emissions reductions by 2030. Provided in Table 4.8-1 is an evaluation of the 5850 Project's consistency with applicable reduction actions/strategies by emissions source category outlined in the 2008 and 2014 *Climate Change Scoping Plan*. As discussed therein, the 5850 Project would be consistent with the GHG reduction-related actions and strategies of the 2008 and 2014 *Climate Change Scoping Plan Update*.

The *2017 Climate Change Scoping Plan* built upon those goals identified in the *2014 Climate Change Scoping Plan Update* and addresses the 2030 horizon. It includes a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation fee to fund the program. The following discussion demonstrates how the pertinent reduction actions relate to and reduce project-related GHG emissions. Table 4.8-2 provides an evaluation of the 5850 Project's consistency with applicable reduction actions/strategies by emissions source category outlined in the *2017 Climate Change Scoping Plan Update*.[27] As discussed therein, the 5850 Project would be consistent with the GHG reduction-related actions and strategies of the *2017 Climate Change Scoping Plan Update.* Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets.

[26] Climate Change Proposed Scoping Plan was approved by CARB on December 11, 2008.

[27] An evaluation of stationary sources is not necessary, as the stationary sources emissions will be created by emergency generators that would only be used in an emergency.

Table 4.8-1
Consistency Analysis—*Climate Change Scoping Plan* and First Update

Actions and Strategies	Responsible Party(ies)	5850 Project Consistency Analysis
Energy		
California Renewables Portfolio Standard (RPS) program: Senate Bill 2X modified California's RPS program to require that both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. California Senate Bill 2X also requires regulated sellers of electricity to meet an interim milestone of procuring 25 percent of their energy supply from certified renewable resources by 2016.	LADWP	**No Conflict.** LADWP's commitment to achieve 35 percent renewables by 2020 would exceed the requirement under the RPS program of 33 percent renewables by 2020. In 2017, LADWP indicated that 29 percent of its electricity came from renewable resources in Year 2016.[a] As LADWP would provide electricity service to the Project Site, the 5850 Project would use electricity that is produced consistent with this performance-based standard. Electricity-related GHG emissions assume that LADWP will receive at least 33 percent of their electricity from renewable sources by 2020.
Senate Bill 350 (SB 350): The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California RPS program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030 and also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.[b]	State Energy Resources Conservation and Development Commission and LADWP	**No Conflict.** LADWP would be required to generate electricity that would increase renewable energy resources to 50 percent by 2030. As LADWP would provide electricity service to the Project Site, the 5850 Project by 2030 would use electricity consistent with the requirements of SB 350. Project buildout would occur in 2023 and, therefore, the estimated GHG emissions from electricity usage provided herein conservatively do not include implementation of SB 350 with a compliance date of 2030. Electricity GHG emissions would be further reduced by 17 percent by Year 2030, as the electricity provided to the Project Site would meet the requirements under SB 350. As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency

Table 4.8-1
Consistency Analysis—*Climate Change Scoping Plan* and First Update

Actions and Strategies	Responsible Party(ies)	5850 Project Consistency Analysis
		standards under the California Code of Regulations (CCR), Title 24, Part 6 (consistency with this regulation is discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, heating ventilation and air-conditioning (HVAC) systems and insulation. The 5850 Project would support this action/strategy because it includes compliance with specific requirements of the Los Angeles Green Code (consistency with this regulation is discussed below).
Senate Bill 1368 (SB 1368): GHG Emissions Standard for Baseload Generation prohibits any retail seller of electricity in California from entering into a long-term financial commitment for baseload generation if the GHG emissions are higher than those from a combined-cycle natural gas power plant.	State, CEC, and LADWP	**No Conflict.** LADWP meets the requirements of SB 1368. As LADWP would provide electricity service to the Project Site, the 5850 Project would use electricity that meets the requirements under SB 1368.
California Code of Regulations (CCR), Title 20: The 2012 Appliance Efficiency Regulations, adopted by the California Energy Commission (CEC), include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California.	State and CEC	**No Conflict.** The Appliance Efficiency Regulations apply to new appliances and lighting that are sold or offered for sale in California. The 5850 Project would include new appliances and lighting that comply with this energy efficiency standard.
CCR, Title 24, Building Standards Code: The 2013 Building Energy Efficiency Standards contained in Title 24, Part 6 (also known as the California Energy Code), requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.	State and CEC	**No Conflict.** Consistent with regulatory requirements, the 5850 Project must comply with applicable provisions of the 2016 Los Angeles Green Code that in turn requires compliance with mandatory standards included in the California Green Building Standards. The 2016 Title 24 standards are 28 percent more efficient (for electricity) than residential construction built to the 2013 Title 24 standards and 5 percent more efficient (for electricity) for non-residential construction built to 2013 Title 24 standards.[c] The 2016 Title 24 standards are more efficient than

Table 4.8-1
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Actions and Strategies	Responsible Party(ies)	5850 Project Consistency Analysis
The California Green Building Standards Code (Part 11, Title 24) established mandatory and voluntary standards on planning and design for sustainable site development, energy efficiency (extensive update of the California Energy Code), water conservation, material conservation, and internal air contaminants.		the 2020 Projected Emissions under Business-as-Usual in CARB's *Climate Action Scoping Plan*. The standards promote the use of better windows, insulation, lighting, ventilation systems and other features that reduce energy consumption in homes and businesses. Thus, the 5850 Project has incorporated energy efficiency standards that are substantially more effective than the measures identified in the *Climate Action Scoping Plan* to reduce GHG emissions.
Energy Independence and Security Act of 2007 (EISA): EISA requires manufacturing for sale within the United States to phase out incandescent light bulbs between 2012 and 2014 resulting in approximately 25 percent greater efficiency for light bulbs and requires approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020.	Federal/ Manufacturers	**Consistent.** The 5850 Project would not use incandescent light bulbs, instead using bulbs that meet increasingly stringent standards for energy efficiency. As such, EISA would serve to reduce the use of incandescent light bulbs for the 5850 Project and, thus, reduce energy usage associated with lighting. Electricity GHG emissions estimates account for a 25-percent reduction in lighting electricity consumption with implementation of this regulation.
Assembly Bill 1109 (AB 1109): The Lighting Efficiency and Toxic Reduction Act prohibits a person from manufacturing for sale in the state specified general purpose lights that contain levels of hazardous substances, as it requires the establishment of minimum energy efficiency standards for all general purpose lights. The standards are structured to reduce average statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018.[d]	State/ Manufacturers	**Consistent.** As with the EISA, discussed above, the 5850 Project would meet the requirements under AB 1109 because it incorporates energy efficient lighting and electricity consumption that complies with local and state green building programs.

Table 4.8-1
Consistency Analysis—*Climate Change Scoping Plan* and First Update

Actions and Strategies	Responsible Party(ies)	5850 Project Consistency Analysis
Cap-and-Trade Program: The program establishes an overall limit on GHG emissions from capped sectors (e.g., electricity generation, petroleum refining, and cement production). Facilities subject to the cap are able to trade permits to emit GHG emissions within the overall limit.	State/ Manufacturers	**No Conflict.** As required by AB 32 and the Climate Change Scoping Plan, the Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in State or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. Therefore, GHG emissions associated with the 5850 Project's electricity usage estimates would be covered by the Cap-and-Trade Program (as LADWP would be a covered entity and would provide electricity to the Project Site) and would be consistent with AB 32 and the Climate Change Scoping Plan.
Mobile Source Emissions		
Assembly Bill 1493 (AB 1493) "Pavley Standards": AB 1493 requires the development and adoption of regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the State. In compliance with AB 1493, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles and light duty trucks of model year 2009 through 2016. Model years 2017 through 2025 are addressed by California's Advanced Clean Cars program (discussed below).	State, CARB	**No Conflict.** The Pavley regulations reduced GHG emissions from California passenger vehicles by about 22 percent in 2012 and are expected to reduce GHG emissions by about 30 percent in 2016, all while improving fuel efficiency. GHG emissions related to vehicular travel by the 5850 Project would benefit from this regulation because vehicle trips associated with the 5850 Project would be affected by AB 1493. Mobile source emissions generated by the 5850 Project would be reduced with implementation of AB 1493 consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions estimates were calculated using CalEEMod that includes implementation of AB 1493 into mobile source emission factors.
Executive Order S-01-07: The Low Carbon Fuel Standard requires a 10-percent or greater reduction by 2020 in the average fuel carbon intensity for	State, CARB	**No Conflict.** GHG emissions related to vehicular travel by the 5850 Project would benefit from this regulation because fuel used by Project-related vehicles would be compliant with the LCFS.

Table 4.8-1
Consistency Analysis—*Climate Change Scoping Plan* and First Update

Actions and Strategies	Responsible Party(ies)	5850 Project Consistency Analysis
transportation fuels in California regulated by CARB. CARB identified the LCFS as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009 (CARB 2009).[e,f]		Mobile source GHG emissions estimates were calculated using CalEEMod that includes implementation of the LCFS into mobile source emission factors.
Advanced Clean Cars Program: In 2012, CARB approved the Advanced Clean Cars Program, a new emissions-control program for model year 2017 through 2025. The program combines the control of smog, soot, and GHG emissions with requirements for greater numbers of zero-emission vehicles. By 2025, when the rules will be fully implemented, the new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.	State, CARB	**No Conflict.** Standards under the Advanced Clean Cars Program would apply to all passenger and light duty trucks used by visitors, employees, and deliveries to the Project Site. GHG emissions related to vehicular travel by the 5850 Project would benefit from this regulation and mobile source emissions generated by the 5850 Project would be reduced with implementation of standards under the Advanced Clean Cars Program consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions estimates conservatively do not include this additional 34-percent reduction in mobile source emissions, as the CalEEMod model does not yet account for this regulation. The 5850 Project would further support this regulation since the 5850 Project would provide at least 20 percent of the total code-required parking spaces to be capable of supporting future electric vehicle supply equipment (EVSE), and the 5850 Project would provide at least 5 percent of the total code-required parking spaces with EV charging stations.
Senate Bill (SB) 375: SB 375 requires integration of planning processes for transportation, land-use and housing. Under SB 375, each Metropolitan Planning Organization would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet a target,	State, CARB Regional, SCAG	**No Conflict.** SB 375 requires SCAG to direct the development of the SCS for the region, which is discussed further below. The 5850 Project represents an infill development within an existing urbanized area that would concentrate new office uses within a High Quality Transit Area (HQTA). Therefore, the 5850 Project would be consistent with SCAG's 2016–2040 RTP/SCS. Furthermore, the 2016–2040 RTP/SCS would result in an

Table 4.8-1
Consistency Analysis—*Climate Change Scoping Plan* and First Update

Actions and Strategies	Responsible Party(ies)	5850 Project Consistency Analysis
created by CARB, for reducing GHG emissions.		estimated 18-percent decrease in per capita GHG emissions from passenger vehicles by 2035 and 21-percent decrease in per capita GHG emissions from passenger vehicles by 2040. As Project-related transportation emissions are reduced by approximately 30 percent, the 5850 Project would be consistent with SB 375 and the 2016-2040 RTP/SCS.
Solid Waste		
California Integrated Waste Management Act of 1989 and Assembly Bill 341: The California Integrated Waste Management Act of 1989 requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows: (1) diversion of 25 percent of all solid waste by January 1, 1995, through source reduction, recycling, and composting activities; and (2) diversion of 50 percent of all solid waste on and after January 1, 2000, through source reduction, recycling, and composting facilities.[g] ***AB 341 (2011)*** amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter.[h]	State	**No Conflict.** GHG emissions related to solid waste generation from the 5850 Project would benefit from this regulation, as it would decrease the overall amount of solid waste disposed of at landfills. The decrease in solid waste would then in return decrease the amount of methane released from the decomposing solid waste. Project-related GHG emissions from solid waste generation include a 50-percent reduction in solid waste generation source emissions per goals of the City. The Applicant would only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341. In addition, the 5850 Project would provide recycling bins at appropriate locations to promote recycling of paper, metal, glass and other recyclables.
Water		
CCR, Title 24, Building Standards Code: The California Green Building Standards Code (Part 11,	State	**Consistent.** Water usage rates were calculated consistent with the requirements under City Ordinance No. 184,248, 2013

Table 4.8-1
Consistency Analysis—*Climate Change Scoping Plan* and First Update

Actions and Strategies	Responsible Party(ies)	5850 Project Consistency Analysis
Title 24) includes water efficiency requirements for new residential and non-residential uses, in which buildings shall demonstrate a 20-percent overall water use reduction.		California Plumbing Code, 2016 California Green Building Code (CALGreen), 2014 Los Angeles Plumbing Code, and 2016 Los Angeles Green Building Code and reflect approximately a 20 percent reduction in water usage as compared to the base demand. Project-related GHG emissions from water-related sources accounts for compliance with water efficiency requirements. Examples of water conservation measures could include: high efficiency toilets, low flow faucets, drought tolerant plants, and drip irrigation systems. Through the inclusion of these types of water conservation measures, the 5850 Project would have an overall water use reduction of 20 percent and would meet the requirements of the California Green Building Standards.
Senate Bill X7-7: The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state is required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. This is an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convene, treat, and distribute the water; it also reduces emissions from wastewater treatment.	State	**Consistent.** As discussed above under Title 24, the 5850 Project would meet this performance-based standard. Water conservation measures consistent with Green Building Code requirements could include: high efficiency toilets, low flow faucets, drought tolerant plants, and drip irrigation systems. The inclusion of these types of water conservation measures that would allow the 5850 Project to achieve the reductions sought by SB X7-7 related to water conservation and related GHG emissions.
Construction		
CARB In-Use Off-Road Regulation: CARB's in-use off- road diesel vehicle regulation ("Off-Road Diesel Fleet Regulation") requires the owners of off-road	CARB	**Consistent.** The 5850 Project would use construction contractors that would comply with this regulation.

Table 4.8-1
Consistency Analysis—*Climate Change Scoping Plan* and First Update

Actions and Strategies	Responsible Party(ies)	5850 Project Consistency Analysis
diesel equipment fleets to meet fleet average emissions standards pursuant to an established compliance schedule.		
CARB In-Use On-Road Regulation: CARB's in-use on- road heavy-duty vehicle regulation ("Truck and Bus Regulation") applies to nearly all privately and federally owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating greater than 14,000 pounds.	CARB	**Consistent.** The 5850 Project would use construction contractors that would comply with this regulation.

[a] *California Energy Commission, Utility Annual Power Content Labels for 2016, www.energy.ca.gov/pcl/labels/.*
[b] *Senate Bill 350 (2015–2016 Reg, Session) Stats 2015, Ch. 547.*
[c] *CEC, Adoption Hearing, 2016 Building Energy Efficiency Standards.*
[d] *2007b. Assembly Bill 1109 (2007–2008 Reg. Session) Stats. 2007, Ch. 534.*
[e] *CARB, Initial Statement of Reason for Proposed Regulation for The Management of High Global Warming Potential Refrigerant for Stationary Sources, October 23, 2009.*
[f] *Carbon intensity is a measure of the GHG emissions associated with the various production, distribution, and use steps in the "lifecycle" of a transportation fuel.*
[g] *Cal. Pub. Res. Code § 41780(a).*
[h] *Cal. Pub. Res. Code § 41780.01(a).*
Table prepared by DKA Planning, 2019.

Table 4.8-2
Consistency Analysis—2017 Scoping Plan Update

Actions and Strategies	Responsible Party(ies)	5850 Project Consistency Analysis
Senate Bill 350 (SB 350):	CPUC, CEC,	**No Conflict.** LADWP is required to generate electricity that would

Table 4.8-2
Consistency Analysis—2017 Scoping Plan Update

Actions and Strategies	Responsible Party(ies)	5850 Project Consistency Analysis
The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California RPS program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030.[a] Required measures include: • Increase RPS to 50 percent of retail sales by 2030. • Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030. • Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in IRPs to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.	CARB	increase renewable energy resources to 33 percent by 2020 and 50 percent by 2030. As LADWP would provide electricity service to the Project Site, by 2030 the 5850 Project would use electricity consistent with the requirements of SB 350. It is assumed that LADWP will receive at least 33 percent of electricity from renewable sources by year 2020 and 50 percent by 2030 (with a straight-line interpolation for the 5850 Project buildout year of 2023). As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, Part 6 (consistency with this regulation is discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation. The 5850 Project would comply with this this action/strategy being located within the LADWP service area and would comply with CalGreen and Title 24 energy efficiency standards.
Implement Mobile Source Strategy (Cleaner Technology and Fuels)	CARB, CalSTA, SGC, CalTrans CEC, OPR,	**No Conflict.** The CARB approved the Advanced Clean Cars Program in 2012 that establishes an emissions control program for model year 2017 through 2025. Standards under the

Table 4.8-2
Consistency Analysis—2017 Scoping Plan Update

Actions and Strategies	Responsible Party(ies)	5850 Project Consistency Analysis
• At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025. • At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030. • Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Cars regulations. • Medium- and heavy-duty GHG Phase 2. • Innovative Clean Transit: Transition to a suite of to-be- determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO_x standard. • Last Mile Delivery: New regulation that would result in the use of low NO_x or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5 percent of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030.	Local agencies	Advanced Clean Cars Program likely will apply to all passenger and light duty trucks used by visitors, employees, and deliveries to the Project Site, depending on the outcome of ongoing negotiations between CARB and EPA regarding federal standards. The Program also requires auto manufacturers to produce an increasing number of zero emission vehicles in the 2018 through 2025 model years. Extension of the Advanced Clean Cars Program has not yet been adopted, but it is expected that measures will be introduced to increase GHG emissions reductions stringency on light duty autos and continue adding zero emission and plug in vehicles through 2030. CARB is also developing the Innovative Clean Transit measure to encourage purchase of advanced technology buses such as alternative fueled or battery powered buses. This would allow fleets to phase in cleaner technology in the near future. CARB is also in the process of developing proposals for new approaches and strategies to achieve zero emission trucks under the Advanced Clean Local Trucks (Last Mile Delivery) Program.[b,c] GHG emissions generated by Project-related vehicular travel would benefit from this regulation, and mobile source emissions generated by the 5850 Project would be reduced with implementation of standards under the Advanced Clean Cars Program, consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions estimates conservatively do not include this additional 34-percent reduction in mobile source emissions, as the CalEEMod model does not yet account for this

Table 4.8-2
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Actions and Strategies	Responsible Party(ies)	5850 Project Consistency Analysis
• Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."		regulation. Although the Innovative Clean Transit and Advanced Clean Local Truck Programs have not yet been established, the 5850 Project would also benefit from these measures once adopted. SB 375 requires SCAG to direct the development of the SCS for the region, which is discussed further below. The 5850 Project represents an infill development within an existing urbanized area that would concentrate new general office uses within an HQTA. Therefore, the 5850 Project would be consistent with SCAG's 2016–2040 RTP/SCS. Furthermore, the 2016–2040 RTP/SCS would result in an estimated 18 percent decrease in per capita GHG emissions from passenger vehicles by 2035 and 21 percent decrease in per capita GHG emissions from passenger vehicles by 2040. 5850-Project-related transportation emissions would be reduced by approximately 30 percent, and therefore, the 5850 Project would be consistent with SB 375 and the 2016–2040 RTP/SCS.
Increase Stringency of SB 375 Sustainable Communities Strategy (2035 Targets)	CARB	**No Conflict.** Under SB 375, the CARB sets regional targets for GHG emission reductions from passenger vehicle use. In 2010, the CARB established targets for 2020 and 2035 for each region. As required under SB 375, the CARB is required to update regional GHG emissions targets every 8 years, which is due to be updated in 2018. As part of the 2018 updates, the CARB has proposed a passenger vehicle related GHG reduction of 19 percent for 2035 for the SCAG region, which is more stringent than the current reduction target of 13 percent for 2035.

Table 4.8-2
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Actions and Strategies	Responsible Party(ies)	5850 Project Consistency Analysis
		The 5850 Project would be consistent with SB 375 by developing an infill project within an existing urbanized area. This would concentrate new office uses within an HQTA. Project-related transportation emissions would be reduced by approximately 30 percent (see Appendix A) based on a combination of factors that reduce travel demand (e.g., transit use) and use of low-carbon fuels, and therefore, the 5850 Project would be consistent with SB 375 and the 2016–2040 RTP/SCS.
By 2019, adjust performance measures used to select and design transportation facilities. • Harmonize project performance with emissions reductions, and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection, etc.).	CalSTA and SGC, OPR, CARB, GoBiz, IBank, DOF, CTC, Caltrans	**Not Applicable.** The 5850 Project would not involve construction of transportation facilities.
By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR/SGC, CARB	**No Conflict.** The 5850 Project would support this policy, as the Applicant would provide electric vehicle charging stations at five percent of total code-required parking spaces for the 5850 Project. In addition, electric vehicle supply wiring (EV-ready) would be available in at least 20 percent of the total code-required parking spaces for the 5850 Project.
Implement California Sustainable Freight Action Plan: • Improve freight system efficiency. • Deploy over 100,000 freight vehicles and	CARB	**Not Applicable.** The 5850 Project's land uses would not include freight transportation or warehousing. Therefore, the 5850 Project would not interfere or impede the implementation of the Sustainable Freight Action Plan.

Table 4.8-2
Consistency Analysis—2017 Scoping Plan Update

Actions and Strategies	Responsible Party(ies)	5850 Project Consistency Analysis
equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.		
Adopt a Low Carbon Fuel Standard with a CI reduction of 18 percent.	CARB	**Not Applicable.** This regulatory program applies to fuel suppliers, not directly to land use development. GHG emissions related to vehicular travel associated with the 5850 Project would benefit from this regulation because fuel used by Project-related vehicles would be required to comply with the LCFS. Mobile source GHG emissions estimates were calculated using CalEEMod that includes implementation of the LCFS into mobile source emission factors. The current LCFS, adopted in 2007, requires a reduction of at least 10 percent in the carbon intensity (CI) of California's transportation fuels by 2020. On September 27, 2018, CARB amended the LCFS regulation to target a 20 percent reduction in CI from a 2010 baseline by 2030.
Implement the Short-Lived Climate Pollutant Strategy by 2030: • 40 percent reduction in methane and hydrofluorocarbon emissions below 2013 levels. • 50 percent reduction in black carbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, SWRCB, Local air districts	**No Conflict.** Senate Bill 605 (SB 605) was adopted in 2014 and directs CARB to develop a comprehensive Short-Lived Climate Pollutant (SLCP) strategy. Senate Bill 1383 was later adopted in 2016 to require CARB to set statewide 2030 emission reduction targets of 40 percent for methane and hydrofluorocarbons and 50 percent black carbon emissions below 2013 levels.[e] The 5850 Project would comply with the CARB SLCP Reduction Strategy by using HVAC equipment with lower GWP refrigerants.
By 2019, develop regulations and programs to	CARB,	**Not Applicable.** This strategy calls on regulators to reduce GHG

Table 4.8-2
Consistency Analysis—2017 Scoping Plan Update

Actions and Strategies	Responsible Party(ies)	5850 Project Consistency Analysis
support organic waste landfill reduction goals in the SLCP and SB 1383.	CalRecycle, CDFA, SWRCB, Local air districts	emissions from landfills and is not applicable to a development project. Under SB 1383, the California Department of Resources Recycling and Recovery (CalRecycle) is responsible for achieving a 50 percent reduction in the level of statewide disposal of organic waste from the 2014 level by 2020 and 75-percent reduction by 2025. Adoption of the regulations to achieve SB 1383 targets is expected in early 2019.[f]
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	**Not Applicable.** This applies to State regulators and is not applicable to a development project. The current Cap-and-Trade program would end on December 31, 2020. Assembly Bill 398 (AB 398) was enacted in 2017 to extend and clarify the role of the state's Cap-and-Trade Program from January 1, 2021, through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink: • Protect land from conversion through conservation easements and other incentives. • Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity. • Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments.	CNRA and departments within, CDFA, CalEPA, CARB	**Not Applicable.** This applies to State regulators and is not applicable to a development project. This regulatory program applies to Natural and Working Lands, not directly related to development of the 5850 Project. However, the 5850 Project would not interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan.

Table 4.8-2
Consistency Analysis—2017 Scoping Plan Update

Actions and Strategies	Responsible Party(ies)	5850 Project Consistency Analysis
• Establish scenario projections to serve as the foundation for the Implementation Plan.		
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018	CARB	**Not Applicable.** This applies to State regulators and is not applicable to a development project. This regulatory program applies to Natural and Working Lands, not directly related to development of the 5850 Project. However, the 5850 Project would not interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan.
Implement Forest Carbon Plan	CNRA, CAL FIRE, CalEPA and departments within	**Not Applicable.** This applies to State regulators and is not applicable to a development project. This regulatory program applies to state and federal forest land, not directly related to development of the 5850 Project. However, the 5850 Project would not interfere or impede implementation of the Forest Carbon Plan.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	**Not Applicable.** This applies to State regulators and is not applicable to a development project. Funding and financing mechanisms are the responsibility of the state and local agencies. The 5850 Project would not conflict with funding and financing mechanisms to support GHG reductions.

[a] *Senate Bill 350 (2015–2016 Regular Session) Stats 2015, Ch. 547.*
[b] *CARB, Advance Clean Cars, Midterm Review, www.arb.ca.gov/msprog/acc/acc-mtr.htm.*
[c] *CARB, Advanced Clean Local Trucks (Last mile delivery and local trucks), www.arb.ca.gov/msprog/actruck/actruck.htm.*
[d] *CARB, LCFS Rulemaking Documents, www.arb.ca.gov/fuels/lcfs/rulemakingdocs.htm.*
[e] *CARB, Reducing Short-Lived Climate Pollutants in California, www.arb.ca.gov/cc/shortlived/shortlived.htm.*
[f] *CARB, Short-Lived Climate Pollutants (SLCP): Organic Waste Methane Emissions Reductions, www.calrecycle.ca.gov/climate/slcp/.*
Source: California Air Resources Board (CARB), California's 2017 Climate Change Scoping Plan, November 2017.
Table prepared by DKA Planning, 2019.

Regional: 2016–2040 RTP/SCS

The 2016–2040 RTP/SCS is expected to help California reach its GHG reduction goals, with reductions in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035.[28] Furthermore, although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2040, the 2016–2040 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040.[29] The 2016–2040 RTP/SCS would result in an estimated 8-percent decrease in per capita passenger vehicle GHG emissions by 2020, 18-percent decrease in per capita passenger vehicle GHG emissions by 2035, and 21-percent decrease in per capita passenger vehicle GHG emissions by 2040. By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an approximately 21-percent decrease in per capita passenger vehicle GHG emissions by 2040 (an additional 3-percent reduction in the five years between 2035 [18 percent] and 2040 [21 percent]), the 2016–2040 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state's GHG emission reduction goals.

The 5850 Project would result in a VMT reduction of approximately 70 percent as compared to the 5850 Project without implementation of VMT reducing measures. This would be consistent with the reduction in transportation emission per capita provided in the 2016–2040 RTP/SCS. This reduction is attributable to the 5850 Project characteristics as being an infill project near transit that supports multi-modal transportation options.

The 5850 Project would also be consistent with the following key GHG reduction strategies in SCAG's 2016–2040 RTP/SCS, which are based on changing the region's land use and travel patterns:

- Compact growth in areas accessible to transit;
- Jobs closer to transit;
- New job growth focused in HQTAs; and
- Biking and walking infrastructure to improve active transportation options and transit access.

The 5850 Project represents an infill development within a dense, urban area that would concentrate new office uses within an HQTA, which is defined by the 2016–2040 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 miles of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.

[28] CARB, Regional Greenhouse Gas Emission Reduction Targets Pursuant to SB 375, Resolution 10-31.

[29] SCAG, Final 2016–2040, RTP/SCS, April 2016, p. 153.

The Project Site is located near the Metro Expo Line light-rail station at La Cienega Boulevard and Jefferson Boulevard, approximately 1,100 feet (0.21 miles) northeast of the Project Site.

As discussed in the Project's Transportation Assessment (included as Appendix F-2 to this Addendum), the Applicant would develop and implement a TDM Program that includes strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips. In addition, the 5850 Project would also provide bicycle storage areas for employees and guests. The 5850 Project would also provide employees and guests with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in VMT and related vehicular GHG emissions. These and other measures would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2016–2040 RTP/SCS.

At the regional level, the 2016–2040 RTP/SCS is an applicable plan adopted for the purpose of reducing GHG emissions. In order to assess the 5850 Project's potential to conflict with the 2016–2040 RTP/SCS, this section also analyzes the 5850 Project's land use assumptions for consistency with those utilized by SCAG in its 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 2016-2040 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. As demonstrated earlier, the 5850 Project would be consistent with the 2016–2040 RTP/SCS.

In sum, the 5850 Project is the type of land use development that is encouraged by the 2016-2040 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the state's long-term climate policies.[30] By furthering implementation of SB 375, the 5850 Project supports regional land use and transportation GHG reductions consistent with state regulatory requirements.

Therefore, as demonstrated in Table 4.8-3, the 5850 Project would be consistent with the 2016–2040 RTP/SCS and the GHG reduction-related actions and strategies contained therein.

[30] As discussed above, SB 375 legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32.

Table 4.8-3
Consistency with the 2016 RTP/SCS

Actions and Strategies	Responsible Party(ies)	5850 Project Consistency Analysis
Land Use Strategies		
Reflect the changing population and demands, including combating gentrification and displacement, by increasing housing supply at a variety of affordability levels.	Local jurisdictions	**Not Applicable.** The 5850 Project is a commercial office development. Nevertheless, the 5850 Project would not inhibit the City's objective of adding to the supply and diversity of housing in metropolitan Los Angeles County.
Focus new growth around transit.	Local Jurisdictions	**Consistent.** The 5850 Project is an infill development that would be consistent with the 2016 RTP/SCS focus on growing near transit facilities. It is located in the dense West Adams-Baldwin Hills-Leimert Community Plan Area. It is also served by Metro's local and Rapid bus services, as well as the Metro Expo Line, with the closest station located at La Cienega Boulevard and Jefferson Boulevard, approximately 1,100 feet northeast of the Project Site.
Plan for growth around livable corridors, including growth on the Livable Corridors network.	SCAG, Local Jurisdictions	**Consistent.** The 5850 Project is an infill development that would be consistent with the 2016 RTP/SCS by focusing growth along the 2,980 miles of Livable Corridors in the region. It is also served by Metro's local and Rapid bus services, as well as the Metro Expo Line, with the closest station located at La Cienega Boulevard and Jefferson Boulevard, approximately 1,100 feet northeast of the Project Site.
Provide more options for short trips through Neighborhood Mobility Areas and Complete Communities.	SCAG, Local Jurisdictions	**Consistent.** The 5850 Project would help further jobs/housing balance objectives that can improve the use of Neighborhood Electric Vehicles for short trips. The 5850 Project is also generally consistent with the Complete Communities initiative that focuses on creation of mixed-use districts in growth areas.
Support local sustainability planning, including developing sustainable planning and design policies, sustainable zoning codes, and Climate Action Plans.	Local Jurisdictions	**Not Applicable.** While this strategy calls on local governments to adopt General Plan updates, zoning codes, and Climate Action Plans to further sustainable communities, the 5850 Project would not interfere with such policymaking and would be consistent with

Table 4.8-3
Consistency with the 2016 RTP/SCS

Actions and Strategies	Responsible Party(ies)	5850 Project Consistency Analysis
		those policy objectives.
Protect natural and farm lands, including developing conservation strategies.	SCAG, Local Jurisdictions	**Not Applicable.** The 5850 Project is an infill development that would help reduce demand for growth in areas that threaten greenfields and open spaces.
Transportation Strategies		
Preserve our existing transportation system.	SCAG, County Transportation Commissions, Local Jurisdictions	**Not Applicable.** While this strategy calls on investing in the maintenance of our existing transportation system, the 5850 Project would not interfere with such policymaking.
Manage congestion through programs like the Congestion Management Program, Transportation Demand Management, and Transportation Systems Management strategies.	County Transportation Commissions, Local Jurisdictions	**No Conflict.** The 5850 Project is an infill development that would minimize congestion impacts on the region because of its proximity to public transit, Complete Communities, and general density of population and jobs.
Promote safety and security in the transportation system.	SCAG, County Transportation Commissions, Local Jurisdictions	**Not Applicable.** While this strategy aims to improve the safety of the transportation system and protect users from security threats, the 5850 Project would not interfere with such policymaking.
Complete our transit, passenger rail, active transportation, highways and arterials, regional express lanes, goods movement, and airport ground transportation systems.	SCAG, County Transportation Commissions, Local Jurisdictions	**Not Applicable.** This strategy calls for transportation planning partners to implement major capital and operational projects that are designed to address regional growth. The 5850 Project would not interfere with this larger goal of investing in the transportation system.
Technological Innovation and 21st Century Transportation		
Promote zero-emission vehicles.	SCAG, Local Jurisdictions	**Consistent.** While this action/strategy is not necessarily applicable on a project-specific basis, the 5850 Project would include both electric vehicle charging stations and additional pre-wiring for future potential electric vehicle charging infrastructure.
Promote neighborhood electric vehicles.	SCAG, Local Jurisdictions	**Consistent.** While this action/strategy is not necessarily applicable on a project-specific basis, the 5850 Project would include both electric vehicle charging stations and additional pre-wiring for future potential electric vehicle charging infrastructure that would promote electric vehicle use.

Table 4.8-3
Consistency with the 2016 RTP/SCS

Actions and Strategies	Responsible Party(ies)	5850 Project Consistency Analysis
Implement shared mobility programs.	SCAG, Local Jurisdictions	**No Conflict.** While this strategy is designed to integrate new technologies for last-mile and alternative transportation programs, the 5850 Project would not interfere with these emerging programs.

Source: Southern California Association of Governments; *2016–2040 RTP/SCS, Chapter 5: The Road to Greater Mobility and Sustainable Growth*; April 2016.
Table prepared by DKA Planning, 2019.

Local: LA Green Plan/Climate LA Plan

The LA Green Plan outlines the goals and actions the City has established to reduce the generation and emission of GHG emissions from both public and private activities. Table 4.8-4 evaluates the 5850 Project's consistency with applicable GHG-reducing actions from the LA Green Plan. As discussed below, the 5850 Project is consistent with the applicable goals and actions of the LA Green Plan. To facilitate implementation of the LA Green Plan, the City adopted the Los Angeles Green Building Code. The 2016 Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code, as amended pursuant to City Ordinance No. 184,692), incorporated by reference the mandatory requirements of the 2016 California Green Building Standards Code (discussed above under Climate Change Scoping Plan).

The 5850 Project would comply with performance-based standards included in the Green Building Code. In order to meet reduction goals in the LA Green Plan, LADWP will continue to implement programs to emphasize water conservation and will pursue securing alternative supplies, including recycled water and storm water capture. With regard to solid waste, the City implemented the RENEW LA plan to meet solid waste reduction goals by expanding recycling to multifamily dwellings, commercial establishments, and restaurants. The 5850 Project would be indirectly affected by these actions and would further reduce water and solid waste generation through the use of water-conserving fixtures and comprehensive waste management practices, respectively, thereby meeting the goals of the LA Green Plan. In addition, LADWP is required to procure a minimum of 33 percent of its energy portfolio from renewable sources by 2020 and would continue to implement programs consistent with the LA Green Plan. Therefore, the 5850 Project would be consistent with the LA Green Plan.

Table 4.8-4
Consistency with Applicable GHG Emissions Goals and Actions of the LA Green Plan

Action		Description	5850 Project Consistency Analysis
Focus Area: Energy			
E6	Present a comprehensive set of green building policies to guide and support private sector development.	The City initiated an effort to establish green building requirements, paired with incentives, for medium- to large-private projects. Buildings account for a majority of electricity use. Each building site relates to a wide range of environmental issues faced by the City, so addressing each site in a comprehensive manner will provide a variety of environmental benefits.	**Consistent.** While this action primarily applies to the City, the 5850 Project would be designed and operated to meet the applicable requirements of the state Green Building Standards Code and the City's Green Building Code.
Focus Area: Water			
W1	Meet all additional demand for water resulting from growth through water conservation and recycling.	The Mayor's Office and LADWP developed the *Securing LA's Water Supply* plan, which is an aggressive, multi-faceted approach to developing a locally sustainable water supply. The plan includes a set of key short-term and long-term strategies to secure our water future, such as: Short-Term Conservation Strategies: • Enforcing prohibited uses of water (levying fines and sanctions against water abusers and increase water conservation awareness). • Expanding the list of prohibited uses of water (possible further restrictions on watering landscape and washing/rinsing vehicles without a self-closing nozzle). • Extending outreach efforts, water conservation incentives,	**No Conflict.** While this action primarily applies to the City and LADWP, the 5850 Project would incorporate Title 24-compliant water conservation features to reduce indoor water use by at least 20 percent. Water conservation measures could include the use of ultra-low flow toilets and hand wash faucets in public facilities.

Table 4.8-4
Consistency with Applicable GHG Emissions Goals and Actions of the LA Green Plan

Action		Description	5850 Project Consistency Analysis
		and rebates. • Encouraging regional conservation measures (encourage all water agencies in the region to adopt water conservation ordinances which include prohibited uses and enforcement). Long-Term Conservation Strategies: • Increasing water conservation through reduction of outdoor water use and new technology. • Maximizing water recycling. • Enhancing stormwater capture • Accelerating cleanup of the groundwater basin. • Expanding groundwater storage.	
W2	Reduce per capita water consumption by 20%.	[See W1, above.]	[See W1, above.]
Focus Area: Transportation			
T4	Complete the Automated Traffic Surveillance and Control System (ATSAC).	This action reduces vehicle emissions that result from idling at intersections. By reducing vehicle stops, delays and travel time through improved traffic signal timing, vehicles can travel a longer distance at a consistent rate of speed, improving fuel economy.	**Not Applicable.** While the City has implemented this action, the 5850 Project would not interfere with the advancement of more signal timing in the City.
T6	Make transit information easily available, understandable, and translated into multiple languages.	A Los Angeles Department of Transportation (LADOT) partnership with the Personnel Department will enable LADOT to determine in which additional languages transit information should be provided. Facilitating	**No Conflict.** While this action primarily applies to the City, the 5850 Project would not impair the ability of the City to make transit information easily available, understandable, and translated into multiple

Table 4.8-4
Consistency with Applicable GHG Emissions Goals and Actions of the LA Green Plan

Action		Description	5850 Project Consistency Analysis
		access to transit information increases the likelihood of transit use, which can reduce single occupancy vehicle trips and help alleviate traffic congestion, and most importantly, reducing associated greenhouse gas emissions.	languages.
T8	Promote walking and biking to work, within neighborhoods, and to large events and venues.	Promoting alternate modes of travel will reduce the carbon emissions associated with single occupancy vehicles (SOVs). As described in Action Items LU1 and LU2 below, the City is promoting high-density and mixed-use housing close to major transportation arteries. Such developments will also support the advancement of Action Item T8, by improving accessibility for those who wish to walk and bike to work.	**Consistent.** While this action primarily applies to the City, the 5850 Project would promote a pedestrian-friendly community by connecting the Project with the community through the provision of significant landscaping, trees, and pedestrian paths. The Project Site is also located in an HQTA as designated by the 2016–2040 RTP/SCS and near regional and local transit services. The 5850 Project would provide employees and visitors with convenient access to public transit and opportunities for walking and biking, including the installation of bicycle parking spaces in accordance with LAMC requirements.
Focus Area: Land Use			
LU 1	Promote high-density housing close to major transportation arteries.	With 469 square miles, Los Angeles is a vast and sprawling city. Yet many neighborhoods are walkable, with stores and services clustered near dense residential housing. As the city continues to redevelop and grow, there is an unprecedented opportunity to rethink the urban environment.	**Not Applicable.** This action is directed at the City to promote high-density housing near transit. The 5850 Project represents an infill development that would provide office uses within an HQTA that is located near major transportation arteries, including the Metro

Table 4.8-4
Consistency with Applicable GHG Emissions Goals and Actions of the LA Green Plan

Action		Description	5850 Project Consistency Analysis
		Accommodating continued growth requires taking advantage of infill opportunities and increasing density along transit corridors.	Expo Line light-rail station at the intersection of Jefferson and La Cienega Boulevards.
LU 2	Promote and implement transit-oriented development (TOD).	Transit Oriented Districts (TODs) represent opportunities for creating cohesive, vibrant, walkable communities where fragmented, auto- dependent corridors now exist. TODs are a positive alternative to low-density traditional land use patterns that typically segregate housing, jobs and neighborhood services from one another. In contrast, TODs cluster these community elements in close proximity, so a greater portion of trips can be made by transit, bike, or on foot.	**Consistent.** While this action primarily applies to the City, the 5850 Project would concentrate new office uses in close proximity to public transit opportunities (e.g., Metro Rail Expo light rail service and bus routes).
Focus Area: Waste			
Ws T1	Reduce or recycle 70 percent of trash by 2015.	Source reduction and recycling programs not only conserve natural resources and landfill space, but also confer climate benefits.	**Consistent.** While this action primarily applies to the City, the 5850 Project would provide adequate storage areas in accordance with the City's Space Allocation Ordinance (Ordinance No. 171,687), which requires that developments include a recycling area or a room of specified size on the Project Site.
Source: DKA Planning, 2019.			

Local: City of Los Angeles Sustainable City pLAn

The Sustainable City pLAn includes both short-term and long-term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. The Sustainable City pLAn provides information as to what the City will

do with buildings and infrastructure in their control. Specific targets related to housing, development, mobility, and transit include decreasing of vehicle miles traveled per capita by 5 percent by 2025, and increasing trips made by walking, biking or transit by at least 35 percent by 2025. The 5850 Project would generally comply with these aspirations, as the 5850 Project is an infill development consisting of office uses on the Project Site, which is located near regional and local transit services, including the Metro Expo Line station at La Cienega and Jefferson Boulevards. The 5850 Project would be well-served by transit and would implement a TDM Program that would encourage transit use. Furthermore, the 5850 Project would comply with CALGreen, implement various project design features to reduce energy usage and conserve water, and comply with the City's Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Sustainable City pLAn with regard to energy-efficient buildings and waste and landfills. The 5850 Project would also provide secure short- and long-term bicycle storage areas for Project employees and guests. Therefore, the 5850 Project would be consistent with the Sustainable City pLAn.

Conclusion

In summary, the plan consistency analysis provided above demonstrates that the 5850 Project complies with or exceeds the plans, policies, regulations and GHG reduction actions/strategies outlined in the *Climate Change Scoping Plan and Update*, the 2016–2040 RTP/SCS, the LA Green Plan, and the Sustainable City pLAn. Consistency with the above plans, policies, regulations, and GHG reduction actions/strategies would reduce the 5850 Project's incremental contribution of GHG emissions. Therefore, the 5850 Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHG emissions. Furthermore, because the 5850 Project is consistent and does not conflict with these plans, policies, and regulations, the 5850 Project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Therefore, Project-specific impacts with regard to climate change would be less than significant.

5850 Project GHG Emissions

As described above, compliance with a GHG emissions reduction plan renders the impacts of a project less than significant. In support of the consistency analysis which describes the 5850 Project's compliance with or exceedance of performance-based standards included in the regulations and policies outlined in the applicable portions of the *Climate Change Scoping Plan*, the 2016–2040 RTP/SCS, the LA Green Plan, and the Sustainable City pLAn, quantitative calculations are provided below.

The 5850 Project would result in direct and indirect GHG emissions generated by different types of emissions sources, including the following:

- Construction: emissions associated with demolition of the existing parking areas, shoring, excavation, grading, and construction-related equipment and vehicular activity;

- Area source: emissions associated with landscape equipment;
- Energy source (building operations): emissions associated with electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting;
- Stationary source: emissions associated with stationary equipment (e.g., emergency generators);
- Mobile source: emissions associated with vehicles accessing the Project Site;
- Solid Waste: emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon; and
- Water/Wastewater: emissions associated with energy used to pump, convey, deliver, and treat water.

The 5850 Project would generate an incremental contribution to and a cumulative increase in GHG emissions. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the 5850 Project is provided below.

Construction

Project construction is anticipated to be completed and the Project is expected to become operational in 2023. A summary of construction details (e.g., schedule, equipment mix, and vehicular trips) and CalEEMod modeling output files are provided in Appendix A. The GHG emissions associated with construction of the 5850 Project were calculated for each year of construction activity. A summary of GHG emissions for each year of construction is presented in Table 4.8-5.

As presented in Table 4.8-5, construction of the 5850 Project is estimated to generate a total of 3,148 $MTCO_2e$. As recommended by the SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the 5850 Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the 5850 Project's operational emissions) in order to determine the 5850 Project's annual GHG emissions inventory.[31] This results in annual 5850 Project construction emissions of 105 $MTCO_2e$. A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in Appendix A.

[31] SCAQMD Governing Board Agenda Item 31, December 5, 2008.

Table 4.8-5
Combined 5850 Project Construction-Related Emissions ($MTCO_2e$)

Year	$MTCO_2e$[a]
2021	1,927
2021	685
2022	536
Total	**3,148**
Amortized Over 30 Years	**105**

[a] *CO_2e was calculated using CalEEMod and the results are provided in Section 2.0 of the Construction CalEEMod output file within Appendix A.*

Source: DKA Planning, 2019.

Operation

Area Source Emissions

Area source emissions were calculated using the CalEEMod emissions inventory model, which includes hearths and landscape maintenance equipment. As shown in Table 4.8-6, the 5850 Project would result in a total of 0.033 $MTCO_2e$ per year from area sources.

Table 4.8-6
Annual 5850 Project GHG Emissions Summary (Buildout)[a]
(metric tons of carbon dioxide equivalent [MTCO2e])

Year	$MTCO_2$[a]
Area[b]	<1
Energy[c] (electricity and natural gas)	3,936
Mobile	3,750
Solid Waste[d]	165
Water/Wastewater[e]	778
Construction	105
Total Emissions	**8,734**

[a] *CO_2e was calculated using CalEEMod and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix A.*

[b] *Area source emissions are from landscape equipment and other operational equipment.*

[c] *Energy source emissions are based on CalEEMod default electricity and natural gas usage rates.*

[d] *Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.*

[e] *Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates.*

Source: DKA Planning, 2019.

Electricity and Natural Gas Generation Emissions

GHG emissions are emitted as a result of activities in buildings when electricity and natural gas are used as energy sources. Combustion of any type of fuel emits CO_2 and other GHG

emissions directly into the atmosphere; when this occurs in a building, it is a direct emission source associated with that building. GHG emissions are also emitted during the generation of electricity from fossil fuels. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant; electricity use in a building generally causes emissions in an indirect manner.

Electricity and natural gas emissions were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the energy usage by applicable emissions factors chosen by the utility company. GHG emissions from electricity use are directly dependent on the electricity utility provider. In this case, GHG intensity factors for LADWP were selected in CalEEMod. The carbon intensity (lbs/MWh) for electricity generation was calculated for the 5850 Project buildout year based on LADWP projections. A straight-line interpolation was performed to estimate the LADWP carbon intensity factor for the Project buildout year. LADWP's carbon intensity projections also take into account SB 350 RPS requirements for renewable energy.

This is conservative, given the 2018 chaptering of SB 100 (De Leon), which requires electricity providers to provide renewable energy for at least 60 percent of their delivered power by 2030 and 100 percent use of renewable energy and zero-carbon resources by 2045. SB 100 also increases existing renewable energy targets, called Renewables Portfolio Standard (RPS), to 44 percent by 2024 and 52 percent by 2027.

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as in plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., heating, ventilation, and air conditioning [HVAC] system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting.

CalEEMod electricity and natural gas usage rates are based on the CEC-sponsored California Commercial End-Use Survey (CEUS) and the California Residential Appliance Saturation Survey (RASS) studies.[32] The data are specific for climate zones; therefore, Zone 11 was selected for the Project Site based on the zip code tool. Since these studies are based on older buildings, adjustments have been made to account for changes to Title 24 building codes but do not reflect 2016 Title 24 standards. For the 5850 Project, an adjustment was made to account for the 2016 Title 24 standards. The 2016 Title 24 standards would be applicable to the 5850 Project, as the 5850 Project would be built after January 1, 2017, when the 2016 Title 24 standards went into effect. The 2016 Title 24 standards are 28 percent more efficient (for electricity) than the 2013 Title 24 standards for residential construction and 5 percent more efficient (for electricity) for non-residential construction.[33] As shown in Table 4.8-6, Project GHG

[32] CEC, Commercial End-Use Survey, March 2006, and California Residential Appliance Saturation Survey, October 2010.

[33] CEC, 2016 Building Energy Efficiency Standards, Frequently Asked Questions.

emissions from electricity and natural gas usage would result in a total of 3,936 $MTCO_2e$ per year.

Mobile Source Emissions

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

Mobile source operational GHG emissions were calculated using CalEEMod and are based on the 5850 Project trip-generation estimates. The 5850 Project represents an infill development within an urbanized area that would concentrate new general office uses within an HQTA.[34] The Project Site is well served by Metro local and Rapid bus services, along with proximity to the Metro Expo Rail line station 1,100 feet away. The 5850 Project would provide bicycle storage areas for Project employees and visitors. The 5850 Project would also incorporate characteristics that would reduce 15 percent of trips and VMT as compared to standard ITE trip generation rates. The 5850 Project characteristics listed below are consistent with the CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for transportation related design techniques.[35] These techniques would reduce vehicle trips and VMT associated with the 5850 Project relative to the standard ITE trip generation rates, which would result in a comparable reduction in VMT and associated GHG emissions. Techniques applicable to the Project include the following (a brief description of the 5850 Project's relevance to the measure is also provided):

- **CAPCOA Measure LUT-1 – Increase Density:** Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies, such as enhanced transit services. The 5850 Project would redevelop the Project Site and generate approximately 1,380 jobs on-site, contributing toward the 8,000 jobs envisioned in the Community Plan and further advancing the objectives of SCAG's smart growth initiatives.

- **CAPCOA Measure LUT-3 – Increase Diversity of Urban and Suburban Developments (Mixed-Use):** The 5850 Project would introduce new office uses on the Project Site. The unique publicly-accessible landscape plan with opportunities for

[34] The Project Site is also located in Transit Priority Area as defined by Public Resources Code Section 20199. Public Resources Code Section 21099 defines a "transit priority area" as an area within 0.5 miles of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." Public Resources Code Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Also refer to the City's ZIMAS System regarding the location of the Project Site within a Transit Priority Area. www.zimas.lacity.org.

[35] CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, 2010.

passive and active recreation will also help increase the diversity of publicly accessible spaces. The addition of office uses on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation (i.e., walking and biking), which would result in corresponding reductions in transportation-related emissions.

- **CAPCOA Measure LUT-4 – Increase Destination Accessibility:** The Project Site is located near a primary job center, also easily accessible by public transportation. Access to multiple destinations, and other commercial and retail uses in proximity to the Project Site would reduce vehicle trips and VMT compared to the statewide average and encourage walking and non-automotive forms of transportation and would result in corresponding reductions in transportation-related emissions as a result of the 5850 Project.

- **CAPCOA Measure LUT-5 – Increase Transit Accessibility:** The 5850 Project would be located near a Metro Expo Line station, as well as Metro local and Rapid Bus service on Jefferson and La Cienega Boulevard. The 5850 Project would also provide bicycle parking spaces to encourage utilization of alternative modes of transportation.

- **CAPCOA Measure LUT-9 – Improve Design of Development:** The 5850 Project would enhance the pedestrian environment through an attractive open space component and improved streetscape, which would enhance walkability in the 5850 Project vicinity. The 5850 Project would also locate a development with a high level of street access, which improves street accessibility and connectivity.

- **CAPCOA Measure SDT-2 – Traffic Calming Measures:** Providing traffic calming measures encourages people to walk or bike instead of using a vehicle. This mode shift results in a decrease in VMT. Streets within a half mile of the Project Site are equipped with sidewalks, and several of the intersections include marked crosswalks and/or count-down signal timers that calm traffic.

CalEEMod calculates VMT based on the type of land use, trip purpose, and trip type percentages for each land use subtype in the 5850 Project (primary, diverted, and pass-by). As shown in Table 4.8-6, the 5850 Project GHG emissions from mobile sources would result in a total of 3,750 $MTCO_2e$ per year. This estimate reflects reductions attributable to the 5850 Project's characteristics (e.g., infill project near transit that supports multi-modal transportation options), as described above.

Solid Waste Generation Emissions

Emissions related to solid waste were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the waste generated by applicable emissions factors provided in Section 2.4 of the USEPA's AP-42, Compilation of Air Pollutant Emission Factors. CalEEMod solid waste generation rates for each applicable land use were selected for this

analysis. As shown in Table 4.8-6, the 5850 Project is expected to result in a total of 165 $MTCO_2e$ per year from solid waste that accounts for a 50-percent recycling/diversion rate.

Water Usage and Wastewater Generation Emissions

GHG emissions are related to the energy used to convey, treat, and distribute water, and treat wastewater. Thus, these emissions are generally indirect emissions from the production of electricity to power these systems. Three processes are necessary to supply potable water; these include (1) supply and conveyance of the water from the source; (2) treatment of the water to potable standards; and (3) distribution of the water to individual users. After use, energy is used as the wastewater is treated and reused as reclaimed water.

Emissions related to water usage and wastewater generation were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the water usage by the applicable energy intensity factor to determine the embodied energy necessary to supply potable water.[36] GHG emissions are then calculated based on the amount of electricity consumed multiplied by the GHG intensity factors for the utility provider. In this case, embodied energy for Southern California supplied water and GHG intensity factors for LADWP were selected in CalEEMod. Water usage rates were calculated consistent with the requirements under City Ordinance No. 184,248, 2016 California Plumbing Code, 2016 CALGreen, 2017 Los Angeles Plumbing Code, and 2016 Los Angeles Green Building Code, and reflect an approximately 20 percent reduction as compared to the base demand.

As shown in Table 4.8-6, 5850 Project GHG emissions from water/wastewater usage would result in a total of 778 $MTCO_2e$ per year, which reflects a 20-percent reduction in water/wastewater emissions consistent with building code requirements as compared to the 5850 Project without sustainability features related to water conservation.

Combined Construction and Operational Emissions

As shown in Table 4.8-7, when taking into consideration implementation of project design features, including the requirements set forth in the City's Green Building Code and the full implementation of current state mandates, the GHG emissions for the 5850 Project would equal a combined total of 8,734 $MTCO_2e$ per year.

Estimated Reduction of Project Related GHG Emissions Resulting from Consistency with Plans

One approach to demonstrating a project's consistency with GHG plans is to show how a project will reduce its incremental contribution through a No Action Taken (NAT) comparison. The analysis in this section includes potential emissions under a NAT scenario and from the 5850 Project at build-out in 2023, based on actions and mandates expected to be in force in 2020.

[36] The intensity factor reflects the average pounds of CO_2e per megawatt generated by a utility company.

As shown in Table 4.8-7, the emissions for the 5850 Project and its associated CARB 2020 NAT scenario are estimated to be 8,734 and 13,176 $MTCO_2e$ per year, respectively, which shows that the 5850 Project would reduce emissions by 34 percent from CARB's 2020 NAT scenario.

Table 4.8-7
Estimated Reduction of 5850-Project-Related GHG Emissions Resulting from Consistency with Plans

Scenario and Source	NAT Scenario*	As Proposed Scenario	Reduction from NAT Scenario	Change from NAT Scenario
Area Sources	<0	<0	-	0%
Energy Sources	6,787	3,936	-2,851	-42%
Mobile Sources	5,342	3,750	-1,592	-30%
Waste Sources	165	165	-	0%
Water Sources	778	778	-	0%
Construction	105	105	-	0%
Total Emissions	13,176	8,734	-4,443	-34%

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, 2019.

The analysis in this section uses the 2017 Scoping Plan's statewide goals as one approach to evaluate the 5850 Project's incremental contribution. The methodology is to compare the 5850 Project's emissions as proposed to the 5850 Project's emissions if the 5850 Project were built using a NAT approach in terms of design, methodology, and technology. This means the 5850 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 5850 Project would contribute to statewide GHG reduction goals. Specifically, the 5850 Project's commercial nature and location in an existing

urban setting provide opportunities to reduce transportation-related emissions. The 5850 Project would eliminate many vehicle trips because travel to and from the Project Site could be captured by public transit and pedestrian travel instead.

Post-2020 Analysis

Recent studies show that the state's existing and proposed regulatory framework will put the state on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050 if additional appropriate reduction measures are adopted.[37] Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the state to meet the 2050 target. Subsequent to the findings of these studies, SB 32 was passed on September 8, 2016, and would require the state board to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. As discussed above, the new plan, outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

As discussed above, SCAG's 2016-2040 RTP/SCS establishes a regulatory framework for achieving GHG reductions from the land use and transportation sectors pursuant to SB 375 and the state's long-term climate policies. The 2016-2040 RTP/SCS ensures VMT reductions and other measures that reduce regional emissions from the land use and transportation sectors. Specifically, the 2016–2040 RTP/SCS would result in an estimated 8 percent decrease in per capita GHG emissions by 2020, an 18-percent decrease in per capita GHG emissions by 2035, and a 21-percent decrease in per capita GHG emissions by 2040. By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an approximately 21-percent decrease in per capita GHG emissions by 2040 (an additional 3-percent reduction in the five years between 2035 [18 percent] and 2040 [21 percent]), the 2016–2040 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state's GHG emission reduction goals.

The 5850 Project provides the type of land use development that is encouraged by the RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB

[37] Energy and Environmental Economics (E3). "Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios" (April 2015); Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158–172). The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved, as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation and electricity sectors.

375, which, in turn, advances the state's long-term climate policies. By furthering implementation of SB 375, the 5850 Project supports regional land use and transportation GHG reductions consistent with state climate targets for 2020 and beyond. In addition, the 5850 Project would be consistent with the Actions and Strategies set forth in the 2016–2040 RTP/SCS. Therefore, the 5850 Project would be consistent with the 2016–2040 RTP/SCS.

Conclusion

Thus, given the 5850 Project's consistency with State, SCAG, and City of Los Angeles GHG emission reduction goals and objectives, the 5850 Project is consistent with applicable plans, policies, and regulations 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 5850 Project's incremental contribution to greenhouse gas emissions and their effects on climate change would not be cumulatively significant.

Mitigation Measures

While the analysis provided above demonstrates that implementation of the 5850 Project would not require any mitigation measures related to greenhouse gas emissions, the 5850 Project would nevertheless implement Mitigation Measure GHG1 from the Certified EIR.

4.8.3 Any new Circumstances Involving New Impacts or Substantially More Severe Impacts?

The 5850 Project would not result in any new or increased significant impacts with respect to its impact on climate change, and the 5850 Project would not conflict with any applicable plan, policy, or regulation with the goal of reducing GHG emissions. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.8.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to GHG emissions. No substantial changes in the environment related to GHG emissions have occurred since certification of the EIR that would result in new or more severe significant environmental impacts.

4.8.5 Mitigation Measures Addressing Impacts

The Certified EIR provided Mitigation Measure GHG1 to address impacts with respect to greenhouse gases during the operation of specific projects. While the analysis provided above demonstrates that implementation of the 5850 Project would not require any mitigation measures related to greenhouse gas emissions, the 5850 Project would nevertheless implement Mitigation Measure GHG1 from the Certified EIR.

4.8.6 Conclusion

There is no new information of substantial importance that has become available relative to GHG emissions. No substantial changes in the environment related to GHG emissions have occurred since certification of the EIR, and no substantial new conditions related to GHG emissions have been identified within the vicinity of the Project Site that would result in new or more severe significant environmental impacts.

4.9 Hazards and Hazardous Materials

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
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	No	No	No	No
(b) Create a significant hazard to the public or the environment through the reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?	Less Than Significant	No	No	No	No
(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	No	No	No	No
(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less Than Significant with Mitigation	No	No	No	Yes
(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No Impact	No	No	No	No
(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less Than Significant	No	No	No	No
(g) Expose people or structures either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	Less Than Significant	No	No	No	No

This section is based on the Certified EIR and the following item, which is included as **Appendix D** to this Addendum:

D Summary of Environmental Conditions, GeoSyntec Consultants, October 2019.

4.9.1 Impact Determination in the EIR

The Certified EIR stated that industrial facilities tend to store, use, and generate larger quantities of hazardous materials and wastes than other types of land uses, and that implementation of the Community Plan would result in a reduction of industrial land within the West Adams CPA. Further, industrial uses allowed within the West Adams CPA would be required to comply with all federal, State, and local regulations that deal with hazardous materials use and transport. In addition, the Certified EIR stated that based on the years of construction for some of the existing buildings within the West Adams CPA, demolition of the buildings could have the potential to release asbestos fibers into the atmosphere if they are not properly stabilized or removed prior to demolition. However, removal of these materials is well regulated. Therefore, with implementation of all applicable local, State, and federal regulations, the Certified EIR determined that implementation of the Community Plan would result in a less than significant impact related to the use, transport, and disposal of hazardous materials.

As stated in the Certified EIR, the Community Plan would replace older structures that may have been built prior to the most recent building codes and regulations. Moreover, the Certified EIR stated that future projects within the West Adams CPA will be required to complete all applicable environmental review processes and to conform with environmental regulations related to new construction and hazardous materials storage, use, and transport. Existing hazardous materials regulations would minimize the potential for exposure to adverse health or safety effects. Though nearly a dozen Methane Zones occur in the West Adams CPA, new construction would be required to comply with the California Department of Conservation, Division of Oil and Gas requirements, and the SCAQMD regulations regarding methane gas. Therefore, the Certified EIR concluded that implementation of the Community Plan would result in less than significant impacts related to upset and accident conditions.

Compliance with all applicable local, State, and federal laws and regulations would regulate, control, or respond to hazardous waste, transport, store, disposal, and clean-up in order to ensure that hazardous materials do not pose a significant risk to nearby receptors, such as schools. Therefore, the Certified EIR determined that implementation of the Community Plan would result in less than significant impacts related to hazardous materials near schools.

As stated in the Certified EIR, there are 174 LUST cleanup sites, other clean-up sites, and permitted underground UST facilities within the West Adams CPA. Future development of sites previously occupied by a hazardous materials generating facility would have the potential to create a significant hazard to the public or the environment unless an environmental site assessment is conducted to determined potential risks and appropriate mitigation. Mitigation Measure HM1 would minimize impacts related to hazardous materials sites. Therefore, with implementation of Mitigation Measure HM1, the Certified EIR determined that implementation of the Community Plan would result in a less than significant impact related to hazards materials sites.

The West Adams CPA is not within an airport land use plan, nor is it within two miles of a public use airport, and therefore, the Certified EIR determined that implementation of the Community Plan would have no impact with respect to airport hazards. Additionally, though the Community Plan increases the population, it will comply with policies to minimize the potential impact of interference with emergency response plans. Therefore, the Certified EIR concluded that implementation of the Community Plan would result in less than significant impacts related to emergency response plans. Finally, as stated in the Certified EIR, implementation of existing local regulations would help minimize wildland fire hazards. Therefore, implementation of the Community Plan would result in less than significant impacts related to wildland fire.

Mitigation Measures

HM1 Any approval of a Discretionary project or "Active Change Area Project" that involves new construction that will involve soil disturbance shall ensure that a Phase I Environmental Site Assessment (ESA) is prepared. The assessment shall be prepared by a Registered Environmental Assessor (REA) in accordance with State standards/guidelines to evaluate whether the site or the surrounding area is contaminated with hazardous substances from the potential past and current uses including storage, transport, generation, and disposal of toxic and hazardous waste or materials. Depending on the results of this study, further investigation and remediation may be required in accordance with local, State, and federal regulations and policies. Any further study found necessary by an REA or relevant federal, state or local agency shall be performed prior to project approval and any remediation found necessary by the REA or any relevant federal, state or local agency shall be performed prior to project approval or made a condition on the project if that is found to be adequate for remediation by an REA or the relevant federal, state or local agency.

4.9.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Project Design Feature

Based on the Project Site's previous uses, the 5850 Project would include the following Project Design Feature:

PDF-1 Prior to the issuance of a grading permit, the Project Applicant will prepare a Soil Management Plan (SMP), which will include protocols to identify impacts, perform confirmation sampling, and segregate excavated material, followed by stockpiling, transportation, disposal, and other appropriate measures. The SMP will be accompanied by a worker health and safety plan and appropriate air quality monitoring during such activities.

Routine Transport, Use, or Disposal of Hazardous Materials

The types of hazardous materials that would be used during construction of the 5850 Project would be typical of those hazardous materials necessary for construction of an office building (e.g., paints, solvents, fuel for construction equipment, building materials, etc.). Although construction of the 5850 Project would require the temporary transport, use, and disposal of hazardous waste, construction activities associated with the 5850 Project would be required to comply with all applicable federal, state, and local regulations governing such activities.

The 5850 Project includes demolition and removal of the existing surface parking lot from the Project Site and construction of an approximately 344,947 square foot office building with four subterranean levels of parking. The types of hazardous materials that would be found on the Project Site during the operation of the 5850 Project would be typically associated with office and commercial land uses – paints, cleaning supplies, and small amounts of petroleum products. The 5850 Project would not require the routine transport, use, or disposal of hazardous materials that would create a significant hazard to the public or the environment. To the extent there would be any such transport, use, or disposal of small amounts of hazardous materials, compliance with existing local, State, and federal regulations would ensure the transport, storage, and use of these materials would not pose a significant hazard to the public or the environment. Therefore, the 5850 Project's impacts related to this issue would be less than significant.

Upset or Accident Conditions

GeoSyntec prepared a Summary of Environmental Findings (included in Appendix D) to document the environmental conditions for the Project Site, which included a summary of the previous Phase I and II Environmental Site Assessments (ESA) performed for the Site. In order to prepare their summary, GeoSyntec reviewed the following documents:

- Phase I Environmental Site Assessment, prepared by Environmental Management Strategies, Inc., November 2008.
- Phase II Environmental Site Assessment, prepared by Environmental Management Strategies, Inc., November 2008.
- Phase I Environmental Site Assessment, prepared by Andersen Environmental, July 2015.
- Phase II Environmental Site Assessment, prepared by Andersen Environmental, September 2015.
- Underground Storage Tank Program – Case Closure Report, prepared by the California Regional Water Quality Control Board, Los Angeles Region, September 2002.

- Fault Rupture Assessment, prepared by UltraSystems Environmental, Inc., dated August 2015.

Underground Storage Tanks

Sparklett's Drinking Water Corporation ("Sparklett's") operated two 10,000-gallon underground storage tanks (USTs), each containing gasoline and diesel that were installed in 1952 and 1986 respectively. The gasoline UST was removed in 1988, under the supervision of the Los Angeles Fire Department. Soil samples were collected from beneath the north and south ends of the tank at an unspecified depth. Laboratory analysis of these samples indicated no detectable (<10 ppm) concentrations of gasoline range total petroleum hydrocarbon (TPHg), diesel range (TPHd), kerosene, and mineral spirits. In 1998, the diesel UST and dispenser fuel island were removed. Following removal of the UST, 23 soil samples were collected from beneath the tank, the dispenser island, the side walls of the dispenser island excavation, and stockpiles, varying in depth from two to 23 ft below ground surface (bgs). One shallow groundwater sample was also collected at 19.5 ft bgs. Soil and groundwater samples were analyzed for petroleum hydrocarbon constituents. Concentrations of TPHd in soil confirmation samples were reportedly above the Maximum Soil Screening Level (MSSL) for groundwater less than 20 ft bgs of 100 mg/kg in both the UST area and dispenser island area. The tank closure report recommended further assessment in the area of the former UST and dispenser island. Per the 2015 Phase I ESA report prepared by Andersen Environmental, additional site assessments were reportedly conducted in 2001 and 2002, under the oversight of the RWQCB, by advancing soil borings that were converted into groundwater monitoring wells. The RWQCB confirmed the completion of a site investigation and corrective action at the Site and issued a no further action (NFA) letter on September 19, 2002, after which the monitoring wells were abandoned.[38]

2008 Phase I ESA

The following presents a summary of the Phase I ESA, prepared by Environmental Management Strategies (EMS) in 2008:

- EMS reviewed a Phase I ESA for the Site dated June 12, 2003, prepared by Environmental Support Technologies (EST). In addition to the investigation/corrective action related to the former UST, this Phase I ESA identified other areas of concern at the Site that included the location of hydraulic lifts, a former clarifier and the sewer/storm drain that is present on an easement at the Site. EST recommended a Phase II ESA to investigate these additional areas identified.

- EMS also reviewed reports (July and November 2003 and May and June 2004) of various soil and groundwater investigations performed by EST (to evaluate the above

[38] Summary of Environmental Conditions, prepared by GeoSyntec Consultants, October 2019, included in Appendix D of this Addendum. See pages 3-4.

areas of concern) which included advancement of 13 soil borings (SB1 through SB12 and SEW1) to maximum depth of 20 ft bgs, collection of 42 soil samples and 9 grab groundwater samples (GW1 through GW9) for petroleum hydrocarbon constituents and volatile organic compounds (VOCs). The soil analysis results indicated elevated concentration of waste oil (between 1,000 to 61,000 mg/kg measured as total recoverable petroleum hydrocarbon [TRPH]) in the area of hydraulic lift, and sewer/storm drain easement. The majority of these elevated concentrations were observed at 2 ft bgs. Petroleum hydrocarbon constituents were also detected in groundwater at a few locations, however, given the groundwater flow direction of northwest, it was concluded that the detection may be an indication of an offsite source, likely the ARCO # 5180 facility located upgradient of the Site.

- EMS identified the presence of petroleum hydrocarbon constituents and VOCs in groundwater to represent a potential Vapor Intrusion Condition (pVIC) at the Site. EMS therefore performed an evaluation of pVIC using the maximum groundwater sampling results (from EST 2003/2004) using Department of Toxic Substance Control (DTSC's) Human and Ecological Risk Division's (HERD) Groundwater Screening Model for estimating human health risk from subsurface vapor intrusion into the buildings. Based on the evaluation, EMS concluded that there does not appear to be a VIC at the Site; however, a future evaluation should be made using data collected from groundwater monitoring wells or soil gas, which is the preferred medium according to DTSC guidance.

- EMS recommended that 1) the detection of 61,000 mg/kg of waste oil at 2 ft bgs near the hydraulic lift should be further investigated to determine the extent of impacts, and 2) a future pVIC evaluation should be performed using data collected from groundwater monitoring wells or soil gas sampling prior to any planned redevelopment.

2008 Phase II ESA

The following presents a summary of the Phase II ESA, prepared by Environmental Management Strategies (EMS) in 2008:

- EMS performed a soil (B1 through B6) and groundwater investigation (B2, B4 and B5) concurrently with the above Phase I ESA to evaluate the elevated concentrations of waste oil and other heavy oil products encountered in soil samples collected by EST. The results indicated:

    - TRPH was detected in soil samples at concentrations ranging from 26 to 530 mg/kg. EMS identified these concentrations to have significantly decreased from the 2003/2004 investigation and stated that the petroleum hydrocarbons appeared to be attenuating in this area.

- VOCs and TPHg were detected in groundwater samples at concentrations less than 10 ug/L and 110 ug/L respectively. EMS concluded that 1) detection of these constituents at the upgradient locations are likely due to migration from ARCO # 5180; and 2) Freon-12 and cis-1,2-dichloroethene (c-1,2-DCE) are common industrial solvents and could be from various off-site sources including three drycleaners located up-gradient of the Site.

- EMS performed an updated pVIC evaluation using the maximum groundwater concentrations of c-1,2-DCE, Freon-12 and MTBE using the same methodology described in Phase I ESA. EMS concluded that there does not appear to be a VIC associated at the Site. EMS also recognized that grab groundwater sampling is not ideal for such evaluation and results from groundwater monitoring wells or collection of additional soil/soil gas sampling would be required in the future.

- Based on the above investigation, EMS recommended the following:

  - Future development will result in soil disturbance, the soil should be monitored for obvious signs of contamination such as odors or staining and should be managed/disposed of appropriately; and

  - Further evaluation should be performed via soil, soil gas and groundwater sampling prior to Site development.

2015 Phase I ESA

Andersen Environmental (AE) conducted a Phase I investigation as part of real estate due diligence for the transfer of the Site in 2015. AE identified the residual concentrations (identified in the UST closure report) in the area of former dispenser island and UST as a recognized environmental condition (REC) and, although no regulatory action was requested, recommended additional investigation. AE also concluded that a soil gas survey should be completed prior to any planned redevelopment.

2015 Phase II ESA

The following presents a summary of the Phase II ESA, prepared by Andersen Environmental in 2015:

- AE conducted an investigation of soil and soil vapor in the area of the former diesel UST and dispenser island to evaluate whether the residual impacts represents a threat to human health or the environment. The results indicated:

  - Soil - One out of three soil investigation locations in the vicinity of the former dispenser island was observed to have residual petroleum hydrocarbon concentrations exceeding the applicable screening levels at that location.

Neither VOCs nor petroleum hydrocarbon constituents were detected at the other two soil investigation locations.

- Soil Vapor - Benzene, ethylbenzene, xylenes, cyclohexane and freon-12 were detected in the soil vapor samples. However, concentrations were below the residential California Human Health Screening Levels5 (CHHSLs) with the exception of ethylbenzene and benzene, which were detected above the respective residential CHHSL at multiple locations. No other VOCs were detected in soil vapor samples.

- To address the above exceedances of the CHHSLs in soil vapor and to evaluate if a significant risk to building occupants from vapor intrusion exists, AE performed Johnson-Ettinger (JE) modeling to quantify the potential vapor intrusion risk with conservative inputs such as the highest detected concentrations of each compound, a sandy soil type, default building dimensions and ceiling heights, and soil vapor probe depths of 5 ft bgs. The results of this evaluation indicated that the residual VOCs do not pose an unacceptable health risk to the Site occupants under commercial scenarios; however, they may pose an unacceptable health risk to potential future Site occupants under a residential scenario.

- AE recommended the following:

  - The RWQCB granted case closure in September 2002 based on historical soil and groundwater data. Therefore, no further action is warranted with respect to any potential risk to groundwater.

  - Appropriate soil management should be implemented during a future redevelopment including protection for worker health and safety.

Summary

Based on the information presented in the summary prepared by GeoSyntec discussed above, the following summarizes the environmental condition for the Project Site:

- The Project Site was remediated to the satisfaction of the RWQCB resulting in an NFA letter issued by the RWQCB in 2002, and there is no current regulatory agency involvement regarding environmental conditions.

- Residual petroleum hydrocarbons from the former USTs, dispenser island and hydraulic lift area remains at the Project Site. Areas of soil impacts may require removal and off-site disposal, if the Project Site is redeveloped. Consistent with PDF-1 (provided above), the 5850 Project would include a Soil Management Plan, which would ensure that impacts with respect to possible soil contamination are less than significant.

- Previous analyses indicate that the VOCs detected in soil vapor do not pose a risk to human health under an industrial or commercial scenario.

Hazardous Materials Near a School

The following schools are located in proximity to the Project Site:

- Echo Horizons School, 3430 McManus Avenue, approximately 1,370 feet or 0.25 miles from the Project Site; and

- Willows Community School, 8509 Higuera Street, approximately 1,220 feet or 0.23 miles from the Project SIte.

While the 5850 Project would be operational during school hours, the 5850 Project would use, at most, minimal amounts of hazardous materials for routine cleaning and maintenance. In addition, there are intervening structures and roadways between the schools and the Project Site. Therefore, the 5850 Project would not pose a significant risk involving the routine transport, use, and disposal of hazardous materials or the accidental release of hazardous materials, and impacts associated with the emission of hazardous materials near an existing or proposed school would be less than significant.

Airport Land Use Plan

As stated in the Certified EIR, the West Adams CPA is not located within an airport land use plan, nor is it within two miles of a public use airport. Therefore, the 5850 Project would have no impact with respect to airport hazards.

Emergency Response Plan

While it is expected that the majority of construction activities for the 5850 Project would be confined to the Project Site, temporary and limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially affect emergency access adjacent to the Project Site. Access to the Project Site and surrounding area during construction of the 5850 Project would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Furthermore, prior to the issuance of a building permit, the Project Applicant would be required by the Los Angeles Fire Department (LAFD) and the Department of Building and Safety to develop an emergency response plan for the 5850 Project in consultation with the LAFD. The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. Preparation and implementation of the Project-specific emergency response plan as required by the City would ensure that 5850 Project impacts related to emergency response would be less than significant.

Wildland Fires

The Project Site is located in an urbanized area of the City and is completely developed. In addition, the Project Site is not located in a Very High Fire Hazard Severity Zone. Thus, the 5850 Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore, the 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Mitigation Measures

The 5850 Project would comply with Mitigation Measure HM1 from the Certified EIR.

4.9.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the 5850 Project would be undertaken that would result in new or more severe significant impacts, and there is no new information of substantial importance that has become available relative to hazards or hazardous materials. No substantial changes to hazards and hazardous materials have occurred since certification of the EIR, and no substantial new hazards and hazardous materials have been identified within the vicinity of the Project Site that would result in new or more severe significant environmental impacts.

4.9.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified related to one or more significant effects related to hazards or hazardous materials not discussed in the EIR, significant effects related to hazards or hazardous materials previously examined that will be substantially more severe than shown in the EIR, or of mitigation measures previously determined to be infeasible which have now been determined to be feasible.

4.9.5 Mitigation Measures Addressing Impacts

As stated above, the 5850 Project would implement Mitigation Measure HM1 from the Certified EIR. Implementation of this measure would ensure that the 5850 Project's impacts with respect to hazardous materials are less than significant.

4.9.6 Conclusion

Based on the above, no new significant impacts or a substantial increase in previously identified impacts to hazards and hazardous materials would occur as a result of the 5850 Project. Therefore, the impacts to hazards and hazardous materials as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.10 Hydrology and Water Quality

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
HYDROLOGY AND WATER QUALITY: Would the project:					
(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	Less Than Significant	No	No	No	No
(b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less Than Significant	No	No	No	No
(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:					
(i) Result in substantial erosion or siltation on- or off-site?	Less Than Significant	No	No	No	No
(ii)Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	Less Than Significant	No	No	No	No
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Less Than Significant	No	No	No	No
(iv) Impede or redirect flood flows?	Less Than Significant	No	No	No	No
(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less Than Significant	No	No	No	No
(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less Than Significant	No	No	No	No

4.10.1 Impact Determination in the EIR

As stated in the Certified EIR, the Project is within the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB). The LARWQCB adopted the Basin Plan for the Los

Angeles region, which designates the beneficial uses of receiving waters, including the Los Angeles River Estuary (Los Angeles Harbor) to which the West Adams CPA discharges, and specifies both narrative and numerical water objectives for receiving waters in the County. The Certified EIR stated that grading, excavation, and other construction activities associated with the implementation of the Community Plan could impact water quality due to erosion resulting from exposed soils that may be transported from a project area in stormwater runoff. Compliance with the National Pollutant Discharge Elimination System (NPDES) program would ensure that stormwater pollutants would not substantially degrade water quality. Further, all new development projects within the West Adams CPA would be required to comply with the City's Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. The Certified EIR determined that compliance with these regulations would ensure that impacts to water quality and groundwater are less than significant, and also that impacts with respect to a water quality control plan or groundwater management plan would also be less than significant.

As stated in the Certified EIR, the West Adams CPA is not a significant area for groundwater recharge and implementation of the Community Plan does not involve direct groundwater withdrawal or injection. Therefore, the Certified EIR concluded that implementation of the Community Plan would result in less than significant impacts related to groundwater.

In addition, implementation of the Community Plan does not substantially alter the existing drainage pattern of the West Adams CPA. Therefore, the Certified EIR determined that implementation of the Community Plan would result in a less than significant impact related to stormwater drainage. No dams or levees are located in or near the West Adams CPA. Therefore, there would be no impacts related to injury or death from flooding caused by dam or levee failure. The Certified EIR stated that implementation of existing regulatory requirements would ensure the Community Plan would not place housing or structures within a flood hazard zone or in an area that would impede or redirect flood flows without incorporating proper mitigation measures. Moreover, the West Adams CPA is not located near the Pacific Ocean. Therefore, the Certified EIR concluded that implementation of the Community Plan would result in less than significant impacts related to flooding and inundation, and inundation by seiche, tsunami, or mudflow.

Mitigation Measures

Impacts related to hydrology and water quality were determined to be less than significant. Therefore, no mitigation measures were required.

4.10.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Water Quality

During construction of the 5850 Project, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be

subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. As stated in the Certified EIR, the 5850 Project would be required to comply with the NPDES General Construction Permit including the preparation of a SWPPP and implementation of BMPs, required to minimize soil erosion and sedimentation from entering the storm drains during the construction period. In addition, the 5850 Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City's discharge requirements would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements.

Stormwater runoff generated during operation of the 5850 Project has the potential to introduce small amounts of pollutants typically associated with office developments (e.g., household cleaners, landscaping pesticides, and vehicle petroleum products) into the stormwater system. Stormwater runoff from precipitation events could carry urban pollutants into municipal storm drains, however during operation the 5850 Project would be required to comply with the City's Low Impact Development (LID) Ordinance. The LID Ordinance applies to all development and redevelopment in the City that requires a building permit. LID plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance, the 5850 Project would be required to capture and treat the first 3/4-inch of rainfall in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Compliance with the LID Plan and SUSMP, including the implementation of BMPs (which could include one or several methods including infiltration, capture and use, bio-filtration and retention, or a combination of methods), would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.

Conformance with these regulations would ensure construction and operational activities would not violate water quality standards, waste discharge requirements, or otherwise substantially degrade surface or groundwater water quality. Therefore, 5850 Project impacts related to water quality would be less than significant.

Groundwater

The Project Site is located in an urbanized area of the City and is completely developed with impervious surfaces. During a storm event stormwater runoff flows to the adjacent roadways where it is directed into the City's storm drain system. As such, the Project Site is not a source of groundwater recharge. Following redevelopment of the Project Site, groundwater recharge would remain negligible, similar to existing conditions. Based on the Geotechnical Engineering Update Study conducted for the Project Site (refer to Appendix C-1), the historic high

groundwater level at the Project Site is 15 feet.[39] The depth of excavation for the 5850 Project's four subterranean levels would exceed this depth. Therefore, temporary dewatering may be required during construction. However, the amount of groundwater infiltration likely to occur would be minimal given the small area and depth to the proposed excavation. In addition, all potential dewatering operations would be conducted in compliance with all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. Due to the operation of dewatering systems being temporary, local groundwater hydrology in the immediate vicinity of the Project Site would be minimally affected. Additionally, all water consumption associated with the 5850 Project would be supplied by LADWP and not from groundwater beneath the Project Site. Thus, impacts related to groundwater as a result of the 5850 Project would be less than significant.

Drainage

Erosion

The Project Site is located in a highly urbanized area of the City, and there are no natural watercourses on the Project Site. As discussed above, the Project Site is completely developed and is considered 100 percent impervious. Current stormwater runoff flows to the local storm drain system. Under the post-5850-Project condition, the Project Site would be developed with additional permeable surfaces when compared to existing conditions, based on the amount of landscaping that would be provided as part of the 5850 Project. The Project Applicant would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the 5850 Project. While grading and construction activities may temporarily alter the existing drainage patterns of the Project Site, BMPs would be implemented to minimize soil erosion impacts during 5850 Project grading and construction activities. In addition, the Project Applicant would be required to implement a LID Plan (during operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. Specifically, the LID Plan would require the implementation of stormwater BMPs to retain or treat the runoff from a storm event producing 3/4-inch of rainfall in a 24-hour period. Therefore, the 5850 Project would not result in substantial erosion or siltation on- or off-site, and impacts would be less than significant.

Runoff

Grading and construction activities on the Project Site may temporarily alter the existing drainage patterns and change off-site flows. However, construction and operation of the 5850 Project would not result in a significant increase in site runoff or any changes in the local drainage patterns that would result in flooding on- or off-site. The 5850 Project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the 5850 Project. Compliance with the LID Ordinance would also reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Therefore, impacts related to runoff would be less than significant.

[39] Geotechnical Engineering Update Study, Advanced Geotechnical Services, Inc., November 20, 2014. Refer to Appendix C.

Three general sources of potential short-term construction-related stormwater pollution associated with the 5850 Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials may effectively mitigate the potential pollution of stormwater by these materials. These same types of common sense, "good housekeeping" procedures, or BMPs, can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

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

Pursuant to City policy, stormwater retention would be required as part of the LID/SUSMP implementation features (despite no increase of imperviousness surfaces on the Project Site). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Further, pollutants resulting from 5850 Project operation, including petroleum products associated with the 5850 Project's parking and circulation areas, would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance requirements. Accordingly, the 5850 Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first three-quarters inch of rainfall in a 24-hour period. Thus, the 5850 Project would not create or contribute surface runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, 5850 Project impacts related to storm drain capacity and water quality would be less than significant.

Activities associated with operation of the 5850 Project could generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars in the parking garage could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. However, impacts to water quality would be reduced since the 5850 Project must comply with water quality standards and wastewater discharge BMPs set forth by the City, the SWRCB, and the 5850 Project's approved LID Plan. Through compliance with existing regulations and the approved LID Plan, the 5850 Project would not create or contribute surface runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, 5850 Project impacts related to storm drain capacity and water quality would be less than significant.

Flood

The Project Site is not located within a 100-year zone, as mapped by the Federal Emergency Management Agency (FEMA).[40] While the Ballona Creek is located west of the Project Site across Jefferson Boulevard, it is a concrete-lined channel completely surrounded by urban uses, including light industrial and commercial uses. Thus, the 5850 Project would not have the potential to impede or redirect flood flows, and no impact would occur.

Tsunami or Seiche

The Project Site is identified in the Safety Element of the General Plan as being located in a potential inundation area.[41] However, the Baldwin Hills dam failure in 1963 and the near collapse of the Van Norman Dam during the 1971 San Fernando Earthquake resulted in strengthening of the federal, state, and local design standards and retrofitting of existing dam facilities. None of the 13 dams in the greater Los Angeles area was severely damaged during the 1994 Northridge Earthquake. This low damage level was due in part to completion of the retrofitting of dams and reservoirs pursuant to the 1972 State Dam Safety Act following the San Fernando earthquake.[42]

To further ensure against dam failure, the LADWP maintains a Water System Reservoir Surveillance Program. Most of LADWP's dams and reservoirs are under the jurisdiction of the California Department of Water Resources, Division of Safety of Dams (DSOD). DSOD issues operating licenses for dams and reservoirs under its jurisdiction, and the owner must comply with certain operation, maintenance, and inspection procedures in order to retain the license to operate the facility. LADWP maintains an assertive dam safety program, consisting of a six-person Reservoir Surveillance Group dedicated to inspecting each in-City reservoir monthly and each of its Owens Valley reservoirs annually or semi-annually. Reservoir inspections include reading groundwater monitoring wells in and around the dams, reading flows at seepage drains, and performing a thorough visual inspection. Many LADWP reservoirs have Movement and Settlement (M&S) survey points installed on, and near, the dams. These points are periodically measured using precision survey equipment. The M&S survey, groundwater, and seepage data are plotted on long-term charts to determine if there has been any significant change over time. LADWP conducts surveillance of the reservoirs as required by DSOD.[43] Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum credible earthquake for the site. As such, the minimal risk of flooding from potential dam or levee failure would not be exacerbated by the 5850 Project. Therefore, impacts related to flooding and risk of release of pollutants would be less than significant.

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

[41] Los Angeles General Plan Safety Element, Exhibit G, Inundation and Tsunami Hazard Areas.

[42] Los Angeles General Plan Safety Element, Page II-16.

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

Water Quality Control Plan

As stated in the Certified EIR, the 5850 Project is within the jurisdiction of the LARWQCB, and grading, excavation, and other construction activities associated with the implementation of the 5850 Project could impact water quality due to erosion resulting from exposed soils that may be transported from the Project Site in stormwater runoff. Compliance with the NPDES program would ensure that stormwater pollutants would not substantially degrade water quality. Further, the 5850 Project would be required to comply with the City's SUSMP requirements. Consistent with the analysis provided in the Certified EIR, compliance with these regulations would ensure that impacts with respect to a water quality control plan or groundwater management plan would be less than significant.

Mitigation Measures

None required.

4.10.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the 5850 Project would be undertaken that would result in new or more severe significant impacts, and there is no new information of substantial importance that has become available relative to hydrology and water quality. No substantial changes related to hydrology and water quality have occurred since certification of the EIR, and no substantial changes have occurred in the physical environment that would result in new or more severe significant environmental impacts.

4.10.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified related to one or more significant effects related to hydrology and water quality not discussed in the EIR, significant effects related to hydrology and water quality previously examined that will be substantially more severe than shown in the EIR, or of mitigation measures previously determined to be infeasible which have now been determined to be feasible.

4.10.5 Mitigation Measures Addressing Impacts

Because the EIR determined the Project would have a less than significant impact on hydrology and water quality, no mitigation measures were required. Implementation of the 5850 Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.10.6 Conclusion

Based on the above, no new significant hydrologic/water quality impacts or a substantial increase in previously identified hydrologic/water quality impacts would occur as a result of the 5850 Project. Therefore, the impacts to hydrology and water quality as a result do not meet the standards for a subsequent or supplemental EIR pursuant to Public Resources Code, Section 21166 or CEQA Guidelines, Section 15162.

4.11 Land Use and Planning

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
LAND USE AND PLANNING: Would the project:					
(a) Physically divide an established community?	Less Than Significant	No	No	No	No
(b) Cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant	No	No	No	No

4.11.1 Impact Determination in the EIR

The Certified EIR stated that implementation of the Community Plan would introduce ordinances that include standards and guidelines for projects within the West Adams CPA, including a Community Plan Implementation Overlay District (CPIO) containing several subdistricts throughout the plan area, as well as amendments to the existing Crenshaw Corridor Specific Plan. The Community Plan also involves General Plan Amendments and zone changes to create consistency with the City's General Plan Framework, as well as to create consistency between both planned and existing uses of parcels and their relationship to surrounding areas. The Community Plan further restricts detrimental uses, incentivizes development in targeted areas, and provides development standards to ensure that new construction is consistent with neighborhood character, as well as corrects minor errors within the existing Community Plan. Moreover, under the Community Plan, several land use designations no longer exist or were refined, and new categories have been added. Existing goals and policies of the 1998 West Adams Community Plan were retained and augmented. The Community Plan focuses on land use, related mobility issues, and urban design. Beyond these changes, the Community Plan and implementing ordinances do not introduce major changes to land use in the West Adams CPA. The Certified EIR determined that the Community Plan is consistent with land use policies of SCAG's Regional Comprehensive Plan (RCP), Regional Transportation Plan (RTP), and the Compass Growth Vision Report. As stated in the Certified EIR, the Community Plan would not conflict with, and would work to implement, key regional policies applicable to the West Adams CPA and surrounding areas. Therefore, the Certified EIR concluded that implementation of the Community Plan would result in less than significant impacts related to land use compatibility and consistency and would not divide an established community.

As discussed in Section 4.4, Biological Resources, of the Certified EIR, there are no habitat conservation plans within the West Adams CPA, and no impact would occur with respect to implementation of the Community Plan.

Mitigation Measures

Impacts related to land use and planning were determined to be less than significant. Therefore, no mitigation measures were required.

4.11.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

While the 5850 Project includes an amendment to the West Adams CPIO to increase the maximum height for the Project Site, the 5850 Project is consistent with the permitted FAR for the Project Site. Further, the 5850 Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the 5850 Project's impacts with respect to land use and planning were accounted for within the analysis contained in the Certified EIR.

Physically Divide an Established Community

The Certified EIR determined that implementation of the Community Plan would not include any extensions of roadways or other development features through currently developed areas that could physically divide or isolate existing neighborhoods or an established community. Instead, the Certified EIR determined that the land use changes in the Community Plan would create consistency between the Community Plan land use map and the actual built land uses on parcels. The Project Site is currently developed with commercial uses and is located in an established urbanized area of the City that is already served by a well-developed roadway system and utility infrastructure. The 5850 Project includes infill development within the confines of the existing Project Site boundaries with land uses similar to those already found in the immediate area. Further, the 5850 Project does not propose any changes to the zoning or land use designation for the Project Site. Thus, the 5850 Project would not physically divide an established community and impacts would be less than significant.

Consistency Analysis

As stated previously, the 5850 Project includes, among other things, an amendment to the CPIO, to allow a maximum height of 320 feet and individual floor height up to 37 feet with atrium space up to 52 feet in height for Parcel E only. The proposed CPIO amendment would not change the General Plan land use designation of Hybrid Industrial for the Project Site. Further, as discussed below, the 5850 Project would be substantially consistent with all of the applicable plans, policies, and regulations contained in regional and local plans. While the policies described below were generally not adopted for the purpose of avoiding or mitigating an environmental effect, an analysis of the 5850 Project's consistency with these policies has nevertheless been provided below, for informational purposes. Finally, as discussed throughout

this Addendum, implementation of the 5850 Project would not result in any significant impacts, nor would the 5850 Project result in increased impacts beyond those identified in the Certified EIR. As such, the 5850 Project's impacts with respect to land use and planning would be less than significant.

SCAG's 2016-2040 RTP/SCS

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

On April 7, 2016, SCAG adopted the 2016-2040 2016-2040 RTP/SCS. The 2016-2040 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, improve public health, and meet the NAAQS as set forth by the Clean Air Act (CAA). As such, the 2016-2040 RTP/SCS contains a regional commitment for the broad deployment of zero- and near-zero-emission transportation technologies in the 2023-2040 timeframe and clear steps to move toward this objective. This is especially critical for the goods movement system. The development of a zero- or near-zero-emission freight transportation system is necessary to maintain economic growth in the region, to sustain quality of life, and to meet federal air quality requirements. The 2016-2040 RTP/SCS puts forth an aggressive strategy for technology development and deployment to achieve this objective. This strategy will have many co-benefits, including energy security, cost certainty, increased public support for infrastructure, GHG emissions reduction, and economic development.

The 2016-2040 RTP/SCS includes a consideration of the economic impacts and opportunities provided by the transportation infrastructure plan set forth in the document, considering the economic and job creation impacts of the direct investment in transportation infrastructure, and also the efficiency gains in terms of worker and business economic productivity and goods movement.

The 2016-2040 RTP/SCS provides a blueprint for improving quality of life for residents by providing more choices for where they will live, work, and play, and how they will move around. It is designed to promote safe, secure, and efficient transportation systems to provide improved access to opportunities, such as jobs, education, and healthcare. Its emphasis on transit and active transportation is designed to allow residents to lead a healthier, more active lifestyle. Its goal is to create jobs, ensure the region's economic competitiveness through strategic investments in the goods movement system, and improve environmental and health outcomes for its 22 million residents by 2040.

The Certified EIR determined that the new Community Plan would be generally consistent with the policies contained in SCAG's RTP/SCS, including land use changes to allow for TOD districts located near transit stations along major corridors and the creation of a CPIO to tailor use and development standards to encourage pedestrian-oriented commercial development

and walkability. The Community Plan's allocation of density is consistent with the RTP/SCS, and as stated earlier, the 5850 Project does not propose any changes to the allowable density of development on the Project Site.

As discussed on Table 4.11-1, the 5850 Project would be substantially consistent with the goals of the 2016-2040 RTP/SCS.

Table 4.11-1
SCAG 2016-2040 RTP/SCS 5850 Project Consistency Analysis

Goal	Consistency Discussion
Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking).	**Consistent.** The 5850 Project is an infill development, located on a site that is already served by existing roadway and nearby transit facilities, including the Metro Expo Line station located approximately 1,100 feet from the Project Site and La Cienega and Jefferson Boulevards. The 5850 Project includes development of an office building that would serve to provide additional employment opportunities for residents in the area. The 5850 Project would enhance the existing streetscape and pedestrian environment with a design that places parking in subterranean levels and includes approximately 100,054 square feet of open space, including 47,854 square feet of landscaping with pathways, paseos, and community seating and gathering areas. Additionally, the 5850 Project includes 69 long-term bicycle parking spaces and 35 short-term parking spaces, which would encourage bicycle use. Finally, as discussed above under "Air Quality," the 5850 Project would not generate any pollutant emissions in excess of SCAQMD's significance thresholds.
Actively encourage and create incentives for energy efficiency, where possible.	**Consistent.** The 5850 Project would comply with 2016 Title 24 standards, the California Green Building Standards Code (CALGreen Code), and the Los Angeles Green Building Code (LAGBC), which are designed to reduce the 5850 Project's energy use. The 5850 Project would also be consistent with the City's Building Code.
Encourage land use and growth patterns that facilitate transit and non-motorized transportation.	**Consistent.** The 5850 Project is an infill development, located on a Site that is already served by existing roadway and nearby transit facilities, including the Metro Expo Line station located approximately 1,100 feet from the Project Site and La

Table 4.11-1
SCAG 2016-2040 RTP/SCS 5850 Project Consistency Analysis

Goal	Consistency Discussion
	Cienega and Jefferson Boulevards. The 5850 Project includes development of an office building that would serve to provide additional employment opportunities for residents in the area. The 5850 Project would enhance the existing streetscape and pedestrian environment with a design that places parking in subterranean levels and includes approximately 47,854 square feet of landscaping, including pathways, paseos, and community seating and gathering areas. Additionally, the 5850 Project includes 69 long-term bicycle parking spaces and 35 short-term parking spaces, which would encourage bicycle use.
Source: Southern California Association of Governments, Regional Transportation Plan/Sustainable Communities Strategy, April 2016.	

SCAQMD's Air Quality Management Plan

The Project Site is located within the South Coast Air Basin and within the jurisdiction of SCAQMD. In conjunction with SCAG, SCAQMD is responsible for formulating and implementing air pollution control strategies, including periodic updates to the AQMP, and guidance to local government about how to incorporate these strategies into their land use plans and decisions about development.

SCAG is responsible for generating the socio-economic profiles and growth forecasts on which land use, transportation, and air quality management and implementation plans are based. The growth forecasts provide the socioeconomic data used to estimate vehicle trips and VMT. Emission estimates then can be forecast by SCAQMD based on these projected estimates. Reductions in emissions due to changes in the socio-economic profile of the region are an important way of taking account of changes in land use patterns. For example, changes in jobs/housing balance induced by changes in urban form and transit-oriented development induce changes in VMT by more closely linking housing to jobs. Thus, socio-economic growth forecasts are a key component to guide the Basin toward attainment of the NAAQS.

The current AQMP establishes a comprehensive regional air pollution control program leading to the attainment of state and federal air quality standards in the Basin. In addition to setting minimum acceptable exposure standards for specified pollutants, the AQMP incorporates SCAG's growth management strategies that can be used to reduce vehicle trips and VMT, and

hence air pollution. These include, for example, co-location of employment and housing, and mixed-use land patterns that allow the integration of residential and non-residential uses.[44]

As discussed above under "Air Quality," the 5850 Project would be consistent with the AQMP.

City of Los Angeles General Plan

The City's General Plan, adopted December 1996 and re-adopted August 2001, provides general guidance on land use issues for the entire City. The General Plan consists of a Framework Element, a Land Use Element, and 10 citywide elements.

Framework Element

The Framework Element of the General Plan serves as guide for the City's overall long-range growth and development policies and serves as a guide to update the community plans and the Citywide elements. The Citywide elements address functional topics that cross community boundaries, such as transportation, and address these topics in more detail than is appropriate in the Framework Element, which is the "umbrella document" that provides the direction and vision necessary to bring cohesion to the City's overall general plan. The Framework Element provides a conceptual relationship between land use and transportation and provides guidance for future updates to the various elements of the General Plan but does not supersede the more detailed community and specific plans. The Land Use chapter of the Framework Element contains Long Range Land Use Diagrams that depict the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, but the community plans determine the specific land use designations. The Land Use Element of the General Plan is contained within 35 community plans. The Project Site is located in the West Adams-Baldwin Hills-Leimert Community Plan Area, discussed below.

As discussed on Table 4.11-2, the 5850 Project would be substantially consistent with the Framework Element.

Table 4.11-2
5850 Project Consistency with Applicable Policies of the Framework Element

Objective	Project Consistency
Framework Element: Land Use Chapter	
Industrial Lands	
Goal 3J: Industrial growth that provides job opportunities for the City's residents and maintains the City's fiscal viability.	
3.14 Provide land and supporting services for the retention of existing and attraction of new industries.	**Consistent.** The 5850 Project would improve the area's economic vitality by increasing industrial land use opportunities in the Jefferson/La Cienega TOD Subarea. The Project Site is currently occupied by surface
3.14.2 Provide flexible zoning to facilitate the clustering of industries and supporting	

[44] 2016 Air Quality Management Plan, Executive Summary; South Coast Air Quality Management District; https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/executive-summary.pdf?sfvrsn=4

Table 4.11-2
5850 Project Consistency with Applicable Policies of the Framework Element

Objective	Project Consistency
uses, thereby establishing viable "themed" sectors (e.g., movie/television, media production, set design, reproductions, etc.).	parking and an approximately 49,877 square-foot media production building that does not maximize the employment generating potential at the Project Site, as most of the Project Site is covered by surface parking. Increasing the maximum building height and individual floor height would allow existing businesses to reasonably expand their operations or new businesses to locate at a site that allows greater flexibility in the building envelope, with a unique design made flexible for today's office, creative and emerging economy, technology and media users. Moreover, increasing the maximum height allows for a smaller building footprint, thus increasing the space available for ground level landscaping and pedestrian uses.
Economic Development	
Goal 7B: A City with land appropriately and sufficiently designed to sustain a robust commercial and industrial base.	
7.2.8 Retain the current manufacturing and industrial land use designations, consistent with other Framework Element policies, to provide adequate quantities of land for emerging industrial sectors.	**Consistent.** The 5850 Project would not change the existing Hybrid Industrial land use designation for the Project Site.
7.2.11 Ensure that the City has sufficient quantities of land suitable to accommodate existing, new and relocating industrial firms, whose operations are appropriate to a specific location in Los Angeles.	**Consistent.** The 5850 Project would improve the area's economic vitality by increasing industrial land use opportunities in the Jefferson/La Cienega TOD Subarea. The Project Site is currently occupied by surface parking and an approximately 49,877 square-foot media production building that does not maximize the employment generating potential at the Project Site, as most of the Project Site is covered by surface parking. Increasing the maximum building height and individual floor height would allow existing businesses to reasonably expand their operations or new businesses to locate at a site that allows greater flexibility in the building envelope, with a unique design made flexible for today's office, creative and emerging economy, technology and media users. Moreover, increasing the maximum height allows for a smaller building footprint, thus increasing the space available for

Table 4.11-2
5850 Project Consistency with Applicable Policies of the Framework Element

Objective	Project Consistency
	ground level landscaping and pedestrian uses.
Goal 7H: A distribution of economic opportunity throughout the City.	
7.10 Program resources in a manner that encourages appropriate development, housing opportunities, transit service and employment generation in all areas of the City, with particular emphasis on those portions of the City which historically have not received a proportional share of such opportunities, consistent with the City's overall economic policies.	**Consistent.** The 5850 Project would improve the area's economic vitality by increasing industrial land use opportunities in the Jefferson/La Cienega TOD Subarea, and would provide employment opportunities for approximately 1,380 people within the West Adams community. In addition, the employment opportunities provided as part of the 5850 Project would be easily accessible from transit, including by bus and also the Metro Expo Line, which has a station at Jefferson and La Cienega Boulevards, approximately 1,100 feet from the Project Site.
7.10.2 Support efforts to provide all residents with reasonable access to transit infrastructure, employment, and educational and job training opportunities.	
Source: City of Los Angeles General Plan, Framework Element.	

West Adams-Baldwin Hills-Leimert Community Plan

The Community Plan is one of 35 Community Plans established for different areas of the City that are intended to implement the policies of the General Plan Framework. Together, the plans make up the Land Use Element of the General Plan. The Community Plan is intended to promote an arrangement of land uses, streets and services, which will encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The Community Plan is also intended to guide development in order to create a healthful and pleasing environment. The community plans coordinate development among the various communities of Los Angeles and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community.

As discussed on Table 4.11-3, the 5850 Project would be substantially consistent with the Community Plan.

Table 4.11-3
5850 Project Consistency with Applicable Goals/Policies of the West Adams-Baldwin Hills-Leimert Community Plan

Goal/Policy	Project Consistency
Sustainability	
Policy LU28-3: Mix of Uses. Ensure a mix of residential, commercial, office and light industrial, where appropriate, to encourage economic sustainability and encourage walkability.	**Consistent.** The 5850 Project would improve the area's economic vitality by increasing industrial land use opportunities in the Jefferson/La Cienega TOD Subarea. The Project Site is currently occupied by surface

Table 4.11-3
5850 Project Consistency with Applicable Goals/Policies of the West Adams-Baldwin Hills-Leimert Community Plan

Goal/Policy	Project Consistency
	parking and an approximately 49,877 square-foot media production building that does not maximize the employment generating potential at the Project Site, as most of the Project Site is covered by surface parking. Increasing the maximum building height and individual floor height would allow existing businesses to reasonably expand their operations or new businesses to locate at a site that allows greater flexibility in the building envelope, with a unique design made flexible for today's office, creative and emerging economy, technology and media users. Moreover, increasing the maximum height allows for a smaller building footprint, thus increasing the space available for ground level landscaping and pedestrian uses. Finally, the Project vicinity includes a mix of existing residential, commercial, office, and light industrial land uses, and the Project would bring quality jobs closer to existing housing. Therefore, the Project would also improve the jobs-housing balance within the Project vicinity.
Policy LU29-2: Green Roofs. Encourage all new building construction to incorporate green roofs and encourage conversions of existing roof space to green roofs in order to maximize opportunities for gardening and reduce heat gain.	**Consistent.** The design of the 5850 Project incorporates green roofs located at grade over the subterranean parking and above portions of the ground level to reduce heat gain.
Transit-Oriented Community Centers	
Goal LU40: A community where the economic vitality of commercial nodes, centers and transit-oriented development areas is increased by encouraging contextual new development that maximizes access to transit, jobs, goods and services, and conserves desirable community character.	**Consistent.** The 5850 Project would improve the area's economic vitality by increasing industrial/commercial land use opportunities in the Jefferson/La Cienega TOD Subarea, and would provide employment opportunities for approximately 1,380 people within the West Adams community. In addition, the employment opportunities provided as part of the 5850 Project would be easily accessible from transit, including by bus and also the Metro Expo line, which has a station at Jefferson and La Cienega Boulevards, approximately 1,100 feet from the Project Site.
Goal LU42: A community where neighborhood serving uses which	**Consistent.** The 5850 Project would improve the area's economic vitality by increasing

Table 4.11-3
5850 Project Consistency with Applicable Goals/Policies of the West Adams-Baldwin Hills-Leimert Community Plan

Goal/Policy	Project Consistency
strengthen and diversify the economic base are attracted by expanding market opportunities for both traditional existing businesses and emerging new businesses.	industrial/commercial land use opportunities in the Jefferson/La Cienega TOD Subarea. Increasing the maximum building height would allow existing businesses to reasonably expand their operations or new businesses to locate at a site that allows greater flexibility in the building envelope, with a unique design made flexible for today's office, creative and emerging economy, technology and media users.
Goal LU46: A community that maintains and increases the commercial employment base for community residents whenever possible.	**Consistent.** The 5850 Project would improve the area's economic vitality by increasing industrial/commercial land use opportunities in the Jefferson/La Cienega TOD Subarea, and would provide employment opportunities for approximately 1,380 people within the West Adams community, potentially including nearby residents located in the Cameo Woods development, at the residences on Bowesfield Street, and at the future residences in the Cumulus project, which is currently under construction. In addition, the employment opportunities provided as part of the 5850 Project would be easily accessible from transit, including by bus and also the Metro Expo line, which has a station at Jefferson and La Cienega Boulevards, approximately 1,100 feet from the Project Site.
Industrial Areas	
Goal LU65: A community where existing and future industrial uses which contribute job opportunities for residents are provided and which minimize environmental and visual impacts to the community.	**Consistent.** The 5850 Project would improve the area's economic vitality by increasing industrial land use opportunities in the Jefferson/La Cienega TOD Subarea, and would provide employment opportunities for approximately 1,380 people within the West Adams community. In addition, the employment opportunities provided as part of the 5850 Project would be easily accessible from transit, including by bus and also the Metro Expo line, which has a station at Jefferson and La Cienega Boulevards, approximately 1,100 feet from the Project Site. As demonstrated throughout this Addendum, all environmental impacts of the 5850

Table 4.11-3
5850 Project Consistency with Applicable Goals/Policies of the West Adams-Baldwin Hills-Leimert Community Plan

Goal/Policy	Project Consistency
	Project, including visual impacts, would be less than significant.
Policy LU65-1: Maintain Existing Industrial Land Where Appropriate. Maintain existing industrial land uses where appropriate as well as designate lands for new emerging industry including industrial parks, research and development facilities, light manufacturing, and other similar uses which provide employment opportunities.	**Consistent.** The 5850 Project would not change the Project Site's existing Hybrid Industrial land use designation or existing Commercial Manufacturing zoning designation. The 5850 Project would improve the area's economic vitality by increasing industrial land use opportunities in the Jefferson/La Cienega TOD Subarea. Increasing the maximum building height would allow existing businesses to reasonably expand their operations or new businesses to locate at a site that allows greater flexibility in the building envelope, with a unique design made flexible for today's office, create and emerging economy, technology and media users. Moreover, increasing the maximum height allows for a smaller building footprint, thus increasing the space available for ground level landscaping and pedestrian uses.
Policy LU65-3: High Quality Projects. Require that projects be designed and developed to achieve a high level of quality, distinctive character and compatibility with existing uses.	**Consistent.** As discussed in greater detail above (under "Aesthetics"), the 5850 Project's architectural design is the aggregate of multiple parts offering varying forms and dimensions for a variety of office related purposes that is compatible with the light industrial area. The 5850 Project would include high quality materials (such as vision glass, spandrel glass, concrete, and glass tubes) and modern articulation as seen throughout the area known as the Hayden Tract. The design of the 5850 Project also includes extensive landscaping and open space. Along a pedestrian route from the Metro Expo Line through a sequence of new and retrofitted office structures is a mixture of trees, paths, and green landscape. Seating, gathering, and walking paths culminate on the Project Site in the park-like venue that surrounds and organizes access to the proposed building.
Goal LU66: A community plan which retains industrial designations that are appropriate in order to maintain and increase the industrial employment for	**Consistent.** The 5850 Project would not change the Project Site's existing Hybrid Industrial land use designation or existing Commercial Manufacturing zoning

Table 4.11-3
5850 Project Consistency with Applicable Goals/Policies of the West Adams-Baldwin Hills-Leimert Community Plan

Goal/Policy	Project Consistency
community residents.	designation. The 5850 Project would improve the area's economic vitality by increasing industrial land use opportunities in the Jefferson/La Cienega TOD Subarea, and would provide employment opportunities for approximately 1,380 people within the West Adams community. In addition, the employment opportunities provided as part of the 5850 Project would be easily accessible from transit, including by bus and also the Metro Expo line, which has a station at Jefferson and La Cienega Boulevards, approximately 1,100 feet from the Project Site.
Policy LU66-1: Link Jobs to Residents. To reconnect neighborhoods by linking residents to nearby jobs, training and needed services.	**Consistent.** The 5850 Project would improve the area's economic vitality by increasing industrial land use opportunities in the Jefferson/La Cienega TOD Subarea, and would provide employment opportunities for approximately 1,380 people within the West Adams community. In addition, the employment opportunities provided as part of the 5850 Project would be easily accessible from transit, including by bus and also the Metro Expo line, which has a station at Jefferson and La Cienega Boulevards, approximately 1,100 feet from the Project Site, as a result of the 5850 Project's enhanced streetscape and pedestrian design. The 5850 Project places parking in subterranean levels and includes approximately 100,054 square feet of open space, including 47,854 square feet of landscaping with pathways, paseos, and community seating and gathering areas.
Policy LU67-1: Enhanced Streetscapes and Urban Design. Improve the quality of life and the built environment by promoting safety through enhanced streetscape and urban design that promotes pedestrian activity and bicycling instead of automobile dependence through better pedestrian orientation of structures and conservation of desirable prevailing neighborhood character.	**Consistent.** The 5850 Project is an infill development, located on a site that is already served by existing roadway and nearby transit facilities, including the Metro Expo line station located approximately 1,100 feet from the Project Site and La Cienega and Jefferson Boulevards. The 5850 Project would enhance the existing streetscape and pedestrian environment with a design that places parking in subterranean levels and includes approximately 100,054 square feet of open space, including 47,854 square feet

Table 4.11-3
5850 Project Consistency with Applicable Goals/Policies of the West Adams-Baldwin Hills-Leimert Community Plan

Goal/Policy	Project Consistency
	of landscaping with pathways, paseos, and community seating and gathering areas. Additionally, the 5850 Project includes 69 long-term bicycle parking spaces and 35 short-term parking spaces, which would encourage bicycle use.
Source: West Adams-Baldwin Hills-Leimert Community Plan.	

West Adams-Baldwin Hills-Leimert Community Plan Implementation Overlay District

The West Adams CPIO District contains seven Subareas, which are parcels characterized by common overarching Community Plan themes, goals, and policies, and are grouped by a common boundary. The Project Site is located within the Jefferson/La Cienega TOD Subarea and designated as Parcel E. This Subarea identifies specific blocks surrounding the Metro Expo Line, La Cienega/Jefferson Station, and provides specific use limitations, development standards, and streetscape guidelines for projects to facilitate TOD. This Subarea identifies parcels where a range of development heights and intensities are permitted. The Jefferson/La Cienega TOD Subarea advances the creation of an employment destination outside of the City Center where a mix of uses that feature emerging and innovative commercial, office, "clean-tech," "information technology," and other "high tech" uses can locate in proximity to existing and future residences within a medium to high intensity transit hub.

As discussed on Table 4.11-4, the 5850 Project would be substantially consistent with the standards provided for the Jefferson/La Cienega TOD Subarea.

Table 4.11-4
5850 Project Consistency with the Jefferson/La Cienega TOD Subarea

Requirement	Compliance	Description of Compliance
V-1 Land Use		
Compliance with Table V-1 and LAMC.	Yes	Office use is permitted.
V-2 Development Standards		
Building Height (A.1.c.)	Yes	320 foot building height permitted with CPIO Amendment.
Architectural Features (A.1.d.)	Yes	Black columns exceed roof level by 15 feet (less than 20%).
Individual Floor Height (A.1.e.)	Yes	Individual floor heights permitted with CPIO Amendment.
Parapet Walls and Guard Rails (A.1.f.)	Yes	The proposed guardrail does not exceed building height by up to 42 inches.

Table 4.11-4
5850 Project Consistency with the Jefferson/La Cienega TOD Subarea

Requirement	Compliance	Description of Compliance
Rooftop Equipment (A.1.g.)	Yes	Roof mechanical units are located centrally to the roof and will not be visible from grade.
Floor Area Ratio (Table V-2.1.)	Yes	The 5850 Project does not exceed 2:1 FAR and is above the minimum required 0.5:1 FAR.
Lot Coverage (C.1.a.1.)	Yes	Lot coverage is 46.79%, which is greater than the required minimum of 30%.
Sidewalk Frontage (D.1.)	Yes	The publicly accessible entrance is facing the street and abuts an open public area. The maximum setback distance is 12 feet, 5 inches.
Building Façade Articulation (D.3.)	Yes	The ground floor elevations are varied and are broken up by pedestrian amenities along the four edges of the 5850 Project and do not exceed 250 feet in length.
Pedestrian Oriented Ground Floor (D.4.)	Yes	The ground floor incorporates publicly accessible lobby space.
Public Access Areas (D.4.a.)	Yes	Public access areas are facing the street.
Pedestrian Entrances (D.4.b.)	Yes	All four entrances are provided at grade, and the main entrance is along the primary frontage street (Jefferson Boulevard).
Ground Floor Façade Glazing (D.4.c.)	Yes	The 5850 Project incorporates 57.6% of façade glazing.
Ground Floor Public Interior Space (D.4.d.)	Yes	The 5850 Project meets the requirements to provide a minimum of 75% of the length of the primary frontage and a minimum depth of 25 feet.
Parking Spaces (Table V-2.2)	Yes	The 5850 Project is providing the minimum required parking (518 spaces), which is 75% of LAMC Code-required parking.
Parking Structures Below Grade (E.2.e.)	Yes	The 5850 Project would provide four levels of subterranean parking.
Access Driveways (E.2.f.)	Yes	Two private driveways are proposedfor the 5850 Project. One (existing) driveway is for access to the loading area, linking to Corbett on the north; and the second (proposed) driveway at a new signalized intersection on the southern portion of the Project Site. The driveways are

Table 4.11-4
5850 Project Consistency with the Jefferson/La Cienega TOD Subarea

Requirement	Compliance	Description of Compliance
		437 feet apart.
Source: West Adams-Baldwin Hills-Leimert Community Plan Implementation Overlay District.		

As described above, the 5850 Project includes an amendment to the West Adams CPIO to increase the maximum height for the Project Site, up to 320 feet. The Project area contains other buildings of the same height as the proposed 5850 Project, including a 320-foot-tall tower currently under construction at the corner of Jefferson and La Cienega Boulevards and the (W)rapper tower, which would be approximately 230 feet in height, currently under construction at the corner of Jefferson and National Boulevards. The 5850 Project is consistent with the permitted floor area ratio (FAR) for the Project Site. The increased height allows for more of the Project Site to be enhanced with landscaping and open spaces that promote human interaction and provide community gathering spaces. The 5850 Project would preserve viable industrial and hybrid industrial land for "clean-tech" and "high-tech" uses, would support other transit-oriented businesses, and would support the creation of high wage jobs and training within the West Adams CPA. Finally, the proposed amendment to the CPIO would not change the General Plan land use designation of Hybrid Industrial for the Project Site.

The 5850 Project provides for an arrangement of buildings and structures, and other improvements that are compatible with the scale and character of the adjacent properties and the surrounding neighborhood. The 5850 Project has been designed to be compatible with neighboring properties. The Project Site and the surrounding area is within a burgeoning creative digital and entertainment community of buildings and users include Nike, the Tennis Channel, Converse, Blur Studio, WeWork and others in the nearby vicinity. Neighboring buildings in the Project vicinity range in height from one to three stories up to 17 and 30 stories (and 230 to 320 feet in height), which are consistent with the proposed 320-foot 22-story 5850 Project. In fact, the 5850 Project is compatible with recent developments that have been higher in height (between 17 and 30 stories) in response in part to the nearby Metro Expo Line station at Jefferson and La Cienega Boulevards.

With respect to building design and pedestrian orientation, the vast majority of the parking spaces would be provided in four subterranean parking levels, allowing for the generous landscaping and open spaces proposed. The requested increase in height would allow the Project Site to be designed in compatibility with existing development on adjacent properties and neighboring properties that are 17 to 30 stories.

The 5850 Project is located along Jefferson Boulevard and placed in a park-like setting that includes approximately 47,854 square feet of landscaping. The Project Site rises upward toward the 5850 Project building in a series of four perimeter mounds that slope from grade level to the second floor of the 5850 Project. The mounds serve as a visual transition upward as the building appears to rise up out of the land. These mounded areas define the primary entry points to the building located in wide open plazas with landscape, hardscape, and pedestrian seating. The mounds provide a buffer between the two largest plazas and the automobile areas

of the parking lot and Jefferson Boulevard. These mounds provide a green roof for interior office spaces. The northeast mound accommodates the loading areas of the 5850 Project, and the southeast mound integrates the access ramp for the subterranean parking structure. The mounds are planted with a combination of native plants and grasses that require low water and provide a diverse range of colors and textures. Pedestrian pathways that lead to building entrances feature decorative paving with integrated benches and pathway lighting.

The 5850 Project not only provides for an arrangement of uses, buildings, structures, open spaces, and other improvements that are compatible with the scale and character of the adjacent properties and the surrounding neighborhood, but would also enhance the surrounding neighborhood. Therefore, the 5850 Project, including the requested CPIO amendment related to height, would be compatible with the surrounding area and impacts would be less than significant.

Mitigation Measures

None required.

4.11.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the 5850 Project would be undertaken that would result in new or more severe significant impacts, and there is no new information of substantial importance that has become available relative to land use. No substantial changes to land use have occurred since certification of the EIR, and no substantial new changes in land use have been identified within the vicinity of the 5850 Project that would result in new or more severe significant environmental impacts.

4.11.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified related to one or more significant effects related to land use not discussed in the EIR, significant effects related to land use previously examined that will be substantially more severe than shown in the EIR, or of mitigation measures previously determined to be infeasible which have now been determined to be feasible.

4.11.5 Mitigation Measures Addressing Impacts

Because the EIR determined the Project would have a less than significant impact on land use, no mitigation measures were required. Implementation of the 5850 Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.11.6 Conclusion

Based on the above, no new significant land use impacts or a substantial increase in previously identified land use impacts would occur as a result of the 5850 Project. Therefore, the impacts to land use as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.12 Mineral Resources

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
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?	Less Than Significant	No	No	No	No
(b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on local general plan, specific plan or other land use plan?	No Impact	No	No	No	No

4.12.1 Impact Determination in the EIR

The Certified EIR stated that State designated oil fields are located within the central western and northeastern portions of the West Adams CPA. Implementation of the Community Plan could therefore potentially result in some development or infrastructure projects on undeveloped/vacant lands within the West Adams CPA. However, as most of this development is infill of existing urban spaces, and these projects are not expected to directly impact mineral resources. Similarly, the Certified EIR stated that areas of more intense development, such as the TOD areas located at Venice/National Boulevards, La Cienega/Jefferson Boulevards, La Brea/Farmdale Avenues, Crenshaw/Jefferson Boulevards, and Crenshaw Boulevard along the Crenshaw/LAX LRT Project corridor that would be allowed under the new Community Plan would not directly affect mineral resources.

As also stated in the Certified EIR, additional policies in the General Plan seek to implement the provisions of the Surface Mining and Reclamation Act of 1975 (SMARA), to establish extraction operations at appropriate sites; to minimize operation impacts on adjacent uses, ecologically important areas, and ground water; to protect the public health and safety; and to require appropriate restoration, reclamation and reuse of closed sites. These policies would reduce impacts in areas near and/or overlaying state- designated oil fields within the West Adams CPA and would not interfere with the extraction of oil and gas resources. Additionally, existing City policies would regulate and identify provisions for districts where production of oil and gas is permitted and how it shall be undertaken. Furthermore, implementation of existing City Codes, regulatory requirements, and policies ensure that the Community Plan results in less-than-significant impacts related to Statewide and regional mineral resources. As stated in the Certified EIR, the West Adams CPA does not contain any land classified as MRZ-2. Therefore,

the West Adams CPA is not underlain by mineral deposits where geologic data indicate that significant measured or indicated resources are present or where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists. Therefore, no impacts related to local mineral resources would occur.

Mitigation Measures

No impacts related to mineral resources were determined for the Community Plan and no mitigation measures were required.

4.12.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The 5850 Project would be located in the Jefferson/La Cienega TOD Subarea, which as stated in the Certified EIR, would not directly affect mineral resources. The Project Site is currently zoned CM-2D-CPIO, and the 5850 Project does not propose any changes to the zoning or to the existing Hybrid Industrial land use designation. Thus, the Project Site is not zoned for oil extraction and drilling, or mining of mineral resources, and there are no such sites at the Project Site. As such, the 5850 Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

Mitigation Measures

None required.

4.12.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the 5850 Project would be undertaken that would result in new or more severe significant impacts, and there is no new information of substantial importance that has become available relative to mineral resources. No substantial changes to mineral resources have occurred since certification of the EIR, and no substantial new changes in mineral resources have been identified within the vicinity of the 5850 Project that would result in new or more severe significant environmental impacts.

4.12.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified related to one or more significant effects related to mineral resources not discussed in the EIR, significant effects related to mineral resources previously examined that will be substantially more severe than shown in the EIR, or of mitigation measures previously determined to be infeasible which have now been determined to be feasible.

4.12.5 Mitigation Measures Addressing Impacts

Because the EIR determined the Project would have no impact on mineral resources, no mitigation measures were required. Implementation of the 5850 Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.12.6 Conclusion

Based on the above, no new significant mineral resources or a substantial increase in previously identified mineral resources would occur as a result of the 5850 Project. Therefore, the impacts to mineral resources as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.13 Noise

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
NOISE: Would the project result in:					
(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Significant and Unavoidable	No	No	No	Yes
(b) Generation of excessive groundborne vibration or groundborne noise levels?	Significant and Unavoidable	No	No	No	No
(c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No Impact	No	No	No	No

This section is based on the Certified EIR and the following item, which is included as **Appendix E** to this Addendum:

E Noise Technical Modeling, DKA Planning, August 2019.

4.13.1 Impact Determination in the EIR

Construction

The Certified EIR stated that construction under the Community Plan would result in temporary increases in ambient noise and vibration levels in the West Adams CPA on an intermittent basis. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers. However, the Certified EIR concluded that under both monitored and presumed noise levels, construction noise would increase ambient noise levels and exceed the significance thresholds for construction activities lasting more than one day and construction activities lasting more than ten days in a three month period. Therefore, without mitigation, the Certified EIR determined that implementation of the Community Plan would result in a significant impact related to construction noise. The Certified EIR stated that vibration generated by pile drivers, clam shovels, and vibratory rollers would exceed the building damage standards

depending on the distance from the source to the receptor. Mitigation Measures N1 and N2 were adopted to reduce construction noise and vibration levels. However, the Certified EIR concluded that impacts related to construction noise and vibration would remain significant and unavoidable.

Operation

As stated in the Certified EIR, the Community Plan objectives promote the internal relationship of mutually supportive uses, such as employment, housing, recreation, and community-serving facilities. It is assumed that the majority of stationary noise associated with implementation of the Community Plan would be generated by heating, ventilation, and air conditioning (HVAC) systems. HVAC systems will be shielded from view to comply with the LAMC, and are not anticipated to significantly increase ambient noise levels. Though the planning policies of the Community Plan encourage new industrial development designs to be compatible with adjacent land uses, the potential exists for residential land uses to be exposed to incompatible noise levels associated with industrial facilities. As stated in the Certified EIR, mobile noise generated by implementation of the Community Plan would not cause the ambient noise level measured at the property line of the affected uses to increase by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" category or any 5 dBA or more increase in noise level. Mitigation Measure N3 was adopted to reduce operational noise levels Therefore, with implementation of Mitigation Measure N3, the Certified EIR concluded that implementation of the Community Plan would result in a less than significant impact related to operational noise.

It is not anticipated that the West Adams CPA will be developed with substantial sources of vibration. Operational ground-borne vibration in the project vicinity would be generated by vehicular travel on the local roadways. Similar to existing conditions, traffic vibration levels would not be perceptible by sensitive receptors. Therefore, the Certified EIR determined that implementation of the Community Plan would result in less than significant impacts related to operational vibration.

Mitigation Measures

N1 Any approval of a Discretionary project or “Active Change Area Project” shall ensure that all contractors include the following best management practices in contract specifications:

- Construction haul truck and materials delivery traffic shall avoid residential areas whenever feasible. If no alternatives are available, truck traffic shall be routed on streets with the fewest residences.

- The construction contractor shall locate construction staging areas away from sensitive uses.

- When construction activities are located in close proximity to noise-sensitive land uses, noise barriers (e.g., temporary walls or piles of excavated material) shall be constructed between activities and noise sensitive uses.

- Impact pile drivers shall be avoided where possible in noise-sensitive areas. Drilled piles or the use of a sonic vibratory pile driver are quieter alternatives that shall be utilized where geological conditions permit their use. Noise shrouds shall be used when necessary to reduce noise of pile drilling/driving.

- Construction equipment shall be equipped with mufflers that comply with manufacturers' requirements.

- The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators where feasible.

N2 Prior to any approval of a Discretionary project or "*Active Change Area Project*" that is adjacent to buildings listed or determined eligible for listing in the National Register of Historic Places or the California Register of Historical Resources, designated as a Historic-Cultural Monument by the City of Los Angeles, or within a Historic Preservation Overlay Zone ("historic buildings"), the City shall ensure all of the following requirements are or will be met:

- Historic buildings adjacent to the project's construction zones are identified.

- A Vibration Control Plan is prepared and approved by the City.

- The Vibration Control Plan shall be completed by a qualified structural engineer.

- The Vibration Control Plan shall include a pre-construction survey letter establishing baseline conditions at potentially affected buildings. The survey letter shall provide a shoring design to protect the identified land uses from potential damage. The structural engineer may recommend alternative procedures that produce lower vibration levels such as sonic pile driving or caisson drilling instead of impact pile driving.

At the conclusion of vibration causing activities, the qualified structural engineer shall issue a follow-on letter describing damage, if any, to impacted buildings. The letter shall include recommendations for any repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken and completed in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24).

N3 Any approval of a Discretionary project or "Active Change Area Project" that includes industrial uses located within 1,000 feet of a residential land use shall ensure that a noise study is completed that uses the significance thresholds established in the City of Los Angeles CEQA Thresholds Guide (including as it may be amended in the future).

Identified impacts shall be mitigated per the City's Noise Ordinance or through any measures identified in the noise study.

4.13.2 Do Proposed Changes Involve New Significant Impacts?

Project Design Feature

During construction, the 5850 Project would include the following Project Design Feature:

PDF-2 All diesel-fueled equipment will use advanced mufflers that reduce noise levels by more than 10 dBA L_{max} at 50 feet of distance to ensure compliance with LAMC Section 112.05.

The following analysis is provided to evaluate the noise impacts of the 5850 Project in accordance with the latest guidance and methodologies:

Environmental Setting

Noise-Sensitive Receptors

Land uses sensitive to noise may include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. The Project Site is located in the West Adams CPA, a diverse neighborhood with commercial and retail uses along major roads like Jefferson and La Cienega Boulevards. There are also numerous video and audio production studios in this area. Examples of key noise-sensitive receptors within the 5850 Project vicinity include, but are not limited to, the following existing and future developments:

- Jefferson Boulevard Studios, video and audio recording and production studios, 5890 West Jefferson Boulevard; approximately 260 feet south of the Project Site.
- Eastham Drive Studios, video and audio recording and production studios, 3582 Eastham Drive; approximately 280 feet south of the Project Site.
- Cumulus multi-family residences (currently under construction), 3321 South La Cienega Boulevard; approximately 710 feet northeast of the Project Site.
- Cameo Woods multi-family residences, 3648 Kalsman Drive; approximately 860 feet south of the Project Site.
- Bowesfield Residences, 5700 block of Bowesfield Street; approximately 1,060 feet east of the Project Site.
- Willows Community School, 8509 Higuera Street; approximately 1,220 feet southwest of the Project Site.

Existing Ambient Noise Levels

The Project Site contains a surface parking lot and an existing two-story commercial building. Noise from the parking lot is generally limited to auto-related activities, such as tire squeals, slamming vehicle doors, and vehicle travel.

In August 2019, DKA Planning took short-term noise measurements near the Project Site to determine the ambient noise conditions of the neighborhood near a subset of sensitive receptors representative of the noise environment near the Project Site.[45] For example, the Jefferson Boulevard Studios, approximately 260 feet south of the Project Site, represent the nearest receptors to the south that would be most impacted by construction or operational noise from the Project Site. Noise levels from the Project Site would be lower at other receptors south of this receptor (e.g., Cameo Woods) because of their more distant location and the presence of buildings that would block the line of sight from noise sources and thereby substantially attenuate noise.

As shown in Table 4.13-1, noise levels range from 50 to 60 dBA L_{eq}. Ambient noise is also influenced by sources typical of residential neighborhoods (e.g., gardeners) and commercial streets (e.g., HVAC noise, construction).

Table 4.13-1
5850 Project Existing Noise Levels

Noise Monitoring Locations	Sound Levels (dBA, L_{eq})
1. Willows Community School	59.5
2. Eastham Drive Studios	54.9
3. Jefferson Boulevard Studios	51.4
4. Bowesfield Residences	56.2
Source: DKA Planning, 2019	

Existing Groundborne Vibration

There are no substantial sources of groundborne vibration at the Project Site. No sources of vibration were perceptible at any noise measurement locations during the course of the field noise study. On Jefferson Boulevard, there was perceptible groundborne vibration from occasional transit buses and large trucks travelling on this major arterial. However, vibration levels surrounding the Project Site are generally imperceptible, suggesting that vibration levels are typically below the 0.01 inches per second threshold of perception for humans.

[45] Noise measurements were taken using a Quest Technologies SoundPro DL Sound Level Meter. The SoundPro meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground.

Noise

Construction

On-Site Construction Activities

During all construction phases, noise-generating activities could occur at the Project Site between the hours of 7:00 AM and 9:00 PM Monday through Friday, in accordance with Section 41.40(a) of the LAMC. On Saturdays, construction would be permitted to occur between 8:00 AM and 6:00 PM. The 5850 Project would require heavy equipment such as excavators, loaders, and other earthmoving vehicles. Smaller equipment such as forklifts, generators, and various powered hand tools would also be utilized. Off-site secondary noises would be generated by construction worker vehicles, vendor deliveries, and haul trucks.

Regulatory compliance with LAMC Section 112.05 would ultimately limit any noise levels from powered construction equipment to 75 dBA or below at 50 feet, as the Project Site is located within 500 feet of zones that allow for residential uses. As provided at the beginning of this section, the 5850 Project would include PDF-2, which states that all diesel-fueled construction equipment would use advanced mufflers to ensure compliance with LAMC Section 112.05. As shown in Table 4.13-2, ambient noise from construction equipment would meet the LAMC's threshold to 75 dBA or lower at 50 feet. Therefore, the 5850 Project's construction noise impacts would be less than significant.

Table 4.13-2
Maximum 5850 Project Construction Noise Levels

Noise Source	Noise Level (dBA, L_{max})[1]		Significant?
	Reference	5850 Project	
Backhoe	77.6	67.6	No
Dozer	81.7	71.7	No
Excavator	80.7	70.7	No
Front End Loader	79.1	69.1	No
Gradall	83.4	73.4	No
Grader	85.0	<75.0	No

[1] Noise levels derived from the Federal Highway Administration's Roadway Construction Noise Model, version 1.1 (FHWA RCNM 1.1). Assumes 10 dBA reduction from exhaust mufflers. Assumes inclusion of PDF-2.

Estimated 5850 Project construction noise levels at receptor locations were also modeled assuming the concurrent use of an excavator and loader working in tandem to represent the most conservative-scenario noise source during the construction phase. This analysis relied on the FHWA's estimates for average noise levels from both types of equipment without advanced noise controls (e.g., high efficiency mufflers). As noted earlier, a subset of sensitive receptors was analyzed to represent a range of environmental conditions in the vicinity of the Project Site. While there are additional receptors in the area, these four locations are representative of how

Project construction could affect a variety of areas located near the Project Site. As shown in Table 4.13-3, noise levels from construction activities could reach as high as 67.8 dBA at the Eastham Drive studios, approximately 260 feet to the west across the Ballona Creek channel. As such, construction noise levels at these receptors would also be less than 75.0 dBA.

Table 4.13-3
5850 Project Construction Noise Levels at Sensitive Receptors - Unmitigated

Receptor Location	Estimated Noise Level (dBA, L_{eq})
1. Willows Community School	55.0
2. Eastham Drive Studios	67.8
3. Jefferson Boulevard Studios	67.7
4. Bowesfield Residences	51.1
Source: DKA Planning, 2019 based on SoundPLAN Essential 5.0 model runs (included in Appendix E).	

Off-Site Construction Activities

With regard to off-site construction-related noise impacts, Section 112.05 of the LAMC does not regulate noise levels from road legal trucks, such as delivery vehicles, concrete mixing trucks, pumping trucks, and haul trucks. However, the operation of these vehicles would still comply with the construction restrictions set forth by Section 41.40 of the LAMC. The 5850 Project is expected to require approximately 21,760 haul trips to export soils to off-site landfills, which would occur over an approximately 136-day grading phase to export soil. Haul trucks would take Jefferson Boulevard to La Cienega Boulevard northbound to the I-10 Freeway.

According to the L.A. CEQA Thresholds Guide, a 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speeds and fleet mix remain constant. The grading phase would average approximately 23 haul trucks per hour, over a seven hour day. These trucks would travel along Jefferson and La Cienega Boulevards, and would then access the I-10 Freeway to reach landfill locations. The marginal addition of approximately 23 haul trucks per hour to local arterials would represent the equivalent of about 46 passenger vehicles, far less than the doubling of traffic volumes on arterials like La Cienega Boulevard that experience about 2,742 vehicles during the AM peak hour.[46] As a result, haul trucks would increase traffic volumes by approximately 1.7 percent on La Cienega Boulevard, far less than the 100 percent increase needed to increase ambient noise levels by 3 dBA. As a result, the 5850 Project's off-site construction noise impact from haul trucks would be considered less than significant.

[46] City of Los Angeles Navigate LA database, LADOT Traffic Data Report ID 4401 (Jefferson Boulevard at La Cienega Boulevard), www.navigatela.lacity.org/navigatela/

Operation

On-Site Operational Noise Sources

During operations, the 5850 Project would produce noise from both on- and off-site sources. As discussed below, the 5850 Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The 5850 Project would also not increase surrounding noise levels by more than 3 dBA CNEL, the minimum threshold of significance adopted by this analysis. As a result, the 5850 Project's on-site operational noise impacts would be considered less than significant.

Mechanical Equipment. HVAC equipment would be located on the building's rooftop, 320 feet in elevation, where equipment generates a sound pressure level of up to 95 dBA at one foot. This mechanical equipment would generate a sound pressure level of approximately 81.9 dBA L_{eq} at five feet.[47] The roof edge on both elevations would create a natural noise barrier that reduces noise levels from rooftop HVAC units by 10 dBA or more, and would reduce any noise exposure for nearby receptors. This is helpful in managing noise, as equipment often operates continuously throughout the day, evening, and night.

Vaults that house pumps, utility fan rooms, and other operational equipment would be located within the subterranean parking levels. As such, this equipment would be fully enclosed within the structure and would produce minimal noise impacts for off-site sensitive receptors that are generally over 260 feet from the Project Site.

Regulatory compliance with LAMC Section 112.02 would further ensure that noises from sources such as heating, air conditioning, and ventilation systems do not increase ambient noise levels at neighboring occupied properties by more than 5 dBA. Given this regulation, the ambient noise levels along Jefferson Boulevard, the relatively quiet operation of modern rooftop-mounted HVAC systems, and distances to receptors, it is unlikely that noise from the 5850 Project's HVAC systems would be audible at off-site locations. The 5850 Project's HVAC systems would be consistent with its surroundings and would not alter the environmental profile of the neighborhood or significantly impact any of the analyzed sensitive receptors.

Parking and Auto-Related Activities. The majority of operational noise from the 5850 Project would come from auto-related activities. This would include approximately 2,910 daily vehicle trips to and from the 5850 Project that would access the Project Site from Jefferson Boulevard. Once in the subterranean parking levels, vehicles would produce other noise (e.g., tire squeal, slamming vehicle doors) that would be contained, as the subterranean parking levels would be fully enclosed on all sides. The location of limited surface parking along the existing building located on the eastern portion of the Project Site would introduce some auto-related noise.

[47] For reference noise levels of HVAC equipment, see City of Moreno Valley, Moreno Valley WalMart Noise Impact Analysis, Table 901; February 10, 2015 and City of Pomona, Pomona Ranch Plaza WalMart Expansion Project, Table 4.4-5; August 2014.

However, this would be a reduction in ambient noise when compared to the existing surface parking that covers a majority of the Project Site.

Commercial Operational Sources. Noise associated with commercial uses would include a variety of operational sources, including human conversation and activities, trash collection, landscape maintenance, and commercial loading operations. These are discussed below:

- Human conversation and activities. Noise associated with everyday human activities would largely be contained internally within the 22-story building. Noise associated with the outdoor open space surrounding the building could include passive activities such as human conversation. These could also be intermittent activities that would produce minimal impacts from human speech, based in large part on the Lombard effect. This phenomenon recognizes that voice noise levels in face-to-face conversations generally increase proportionally to background ambient noise levels, but only up to approximately 67 dBA at a reference distance of one meter. Specifically, vocal intensity increases about 0.38 dB for every 1.0 dB increase in noise levels above 55 dB, meaning people talk slightly above ambient noise levels in order to communicate.[48]

- Landscape maintenance. Noise from gas-powered leaf blowers, lawnmowers, and other landscape equipment can generate substantial bursts of noise during regular maintenance. For example, gas powered leaf blowers and other equipment with two-stroke engines can generate 100 dBA L_{eq} and cause nuisance or potential noise impacts for nearby receptors.[49] Any intermittent landscape equipment would operate during the day and would represent a negligible impact and ultimately be subject to compliance with LAMC Section 112.05 and nuisance regulations.

- Trash collection. On-site trash and recyclable materials would be managed and picked-up in the parking garage, where trash and recycling trucks would access this facility from Jefferson Boulevard. Solid waste activities would include use of trash compactors and hydraulics associated with the refuse trucks themselves. While noise levels of approximately 71 dBA L_{eq} and 66 dBA L_{eq} could be generated by collection trucks and trash compactors, respectively, at 50 feet of distance, all noise would be buffered from off-site sensitive receptors because of the underground and enclosed location of these activities.[50]

- Commercial loading. On-site loading and unloading activities for the office building would be managed inside the parking garage, where trucks would access these facilities from the northern entrance off Jefferson Boulevard. As this loading activity would occur inside the underground garage, there would be negligible noise impacts on off-site receptors. LAMC

[48] Acoustical Society of America, Volume 134; Evidence that the Lombard effect is frequency-specific in humans, Stowe and Golob, July 2013.

[49] Erica Walker et al, Harvard School of Public Health; Characteristics of Lawn and Garden Equipment Sound; 2017

[50] RK Engineering Group, Inc. Wal-Mart/Sam's Club reference noise level, 2003

Section 114.03 prohibits loading and unloading causing any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between the hours of 10 PM and 7 AM.

The cumulative impact of on-site operational noise sources would include auto-related activity on the surface-level driveways, roof-top HVAC mechanical equipment, and landscape maintenance. Other operational activities would occur in the four-level subterranean garage. As illustrated in Table 4.13-4, the resulting noise impacts on local receptors would be negligible (increases of 0.1 dBA L_{eq} or less) and would not increase ambient noise levels by 5 dBA L_{eq} or more. These four off-site locations are a subset of nearby sensitive receptors that represent the range of potential noise impacts near the Project Site. Therefore, the impact of on-site operational noise sources from the 5850 Project would be considered less than significant.

Table 4.13-4
On-Site 5850 Project Operational Noise Impacts at Off-Site Sensitive Receptors

Building	Maximum Operational Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase/ Significant Impact?
1. Willows Community School	25.2	59.5	59.5	0.0/No
2. Eastham Drive Studios	35.6	54.9	55.0	0.1/No
3. Jefferson Boulevard Studios	35.3	51.4	51.5	0.1/No
4. Bowesfield Residences	27.1	56.2	56.2	0.0/No
Source: DKA Planning, 2019				

Off-Site Operational Noise Sources

The majority of the 5850 Project's operational noise impacts would occur off-site from the approximately 2,910 daily vehicles that would travel to and from Project Site.[51] This would include 346 AM peak hour trips and 344 PM peak hour trips that would use Jefferson Boulevard exclusively when approaching or leaving the Project Site. As noted earlier, the 5850 Project would have to double traffic on local roadways in order to elevate roadway noise levels by 3 dBA L_{eq} or more.

However, the 5850 Project's incremental traffic increase on Jefferson Boulevard would only represent approximately 1.3 percent of existing traffic volumes on this arterial. Specifically, even if the 5850 Project's contribution of up to 346 AM peak hour trips were all distributed onto Jefferson Boulevard, it would represent an increase of 12.8 percent of the 2,711 trips on this major arterial. The 5850 Project's traffic noise impact on other streets would be less, as 5850-Project-related traffic would dissipate onto the network of streets in the area.

As such, peak-hour 5850-Project-related traffic would generate far less than a doubling of traffic on Jefferson Boulevard and would result in an inaudible increase in traffic-related noise on local

[51] Gibson Transportation Consulting, Traffic Impact Analysis For 5850 Jefferson Boulevard Project, June 2020, Appendix F.

streets. Therefore, the 5850 Project's operational impact on off-site ambient noise levels as a result of its net traffic generation would be consistent with the Municipal Code, and the impact would be less than significant.

Vibration

Construction

On-Site Sources

Construction of the 5850 Project could require large steel-tracked earthmoving equipment such as excavators. Though these vehicles may be capable of generating maximum vibration levels of 0.089 inches per second PPV at a reference distance of 25 feet, it is important to note that these vehicles would not be capable of operating directly where the 5850 Project's property line abuts adjacent structures. These vehicles would retain some setback to preserve maneuverability, in addition to operating at reduced power and intensity to maintain precision at these locations.

As a result, vibration levels of 0.089 inches per second PPV, representative of maximum, peak operations, would not be generated at the property lines of the 5850 Project. Smaller, more maneuverable and precise equipment and techniques capable of fine grading at property lines would only generate maximum vibration levels of 0.003 inches per second PPV. Table 4.13-5 shows the 5850 Project's estimated construction vibration impacts at the nearest off-site structures. No building would experience potentially damaging levels of groundborne vibration as a result of the 5850 Project's construction activities, and more distant structures would experience lesser impacts. Therefore, the 5850 Project's vibration impacts as generated by on-site construction activities would be considered less than significant.

Table 4.13-5
Building Damage Vibration Levels – On-Site Sources

Building	Distance (feet)	Condition[1]	Significance Criteria (in/sec)[1]	Estimated Maximum Vibration Velocity (in/sec PPV)	Significant Impact?
Large Dozer-Type Equipment					
5830 West Jefferson Boulevard	45	Reinforced concrete, steel or timber	0.5	0.034	No
Jefferson Boulevard Studios	280	Reinforced concrete, steel or timber	0.5	0.008	No
Eastham Drive Studios	260	Reinforced concrete, steel or timber	0.5	0.009	No
Small Dozer-Type Equipment					
5830 West Jefferson Boulevard	45	Reinforced concrete, steel or timber	0.5	0.001	No

Jefferson Boulevard Studios	280	Reinforced concrete, steel or timber	0.5	0.000	No
Eastham Drive Studios	260	Reinforced concrete, steel or timber	0.5	0.000	No

[1]Structural condition and significance criteria based on FTA guidelines issued in the 2018 FTA Transit Noise and Vibration Impact Assessment manual.

Source: DKA Planning, 2019

For structures further away, such as the residences that are over 1,000 feet to the east of the Project Site, vibration-related impacts would be negligible given the distance to these buildings. As such, construction of the 5850 Project would have less than significant vibration impacts on residential buildings east of the Project Site.

Off-Site Sources

With regard to off-site construction-related noise impacts, Section 112.05 of the LAMC does not regulate noise levels from road-legal trucks, such as delivery vehicles, concrete mixing trucks, pumping trucks, and haul trucks. However, the operation of these vehicles would still comply with the construction restrictions set forth by Section 41.40 of the LAMC. The 5850 Project is expected to require haul trips to export soils to the off-site Chiquita Canyon Landfill. While a haul route has not been finalized, trucks would likely use Jefferson and La Cienega Boulevards (as shown in Figures 1-29 and 1-30), bypassing local collector roads. Haul trucks would generate occasional noise events at receptors during passbys, but such intermittent noise events would have a limited effect on surrounding ambient noise levels on both major arterials. As a result, the 5850 Project's off-site construction noise impact from haul trucks would be consistent with the Municipal Code.

As discussed earlier, construction of the 5850 Project would generate trips from large trucks including haul trucks, concrete mixing trucks, concrete pumping trucks, and vendor delivery trucks. Regarding building damage, based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.006 PPV) at a distance of 50 feet from the truck.[52] According to the FTA "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." Nonetheless, there are existing buildings along the 5850 Project's anticipated haul route(s) that are situated approximately 25 feet from the right-of-way and would be exposed to ground-borne vibration levels of approximately 0.006 PPV. This estimated vibration generated by construction trucks traveling along the anticipated haul route(s) would be well below the most stringent building damage criteria of 0.12 PPV for buildings extremely susceptible to vibration. The 5850 Project's potential to damage roadside buildings and structures as the result of groundborne vibrations generated by its truck trips would therefore be considered less than significant.

[52] Federal Transit Administration, "Transit Noise and Vibration Impact Assessment," May 2006, Figure 7-3.

Operation

During 5850 Project operations, there would be no significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. The 5850 Project's long-term vibration impact from operational sources (primarily passenger vehicles) would be nominal and less than significant.

Airport Noise

The Project Site is not located within an airport land use plan or within two miles of a public airport or a public use airport. The 5850 Project would therefore not expose people residing or working in the Project area to excessive noise levels from an airport use. Therefore, no impact would occur.

Mitigation Measures

The 5850 Project would comply with Mitigation Measure N1 from the Certified EIR.

Mitigation Measure N2 is not applicable to the 5850 Project, as none of the adjacent buildings have been listed or determined eligible to be listed on a historic register. Mitigation Measure N3 is not applicable to the 5850 Project as the 5850 Project does not include the development of an industrial use.

4.13.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

The 5850 Project would not result in new or increased significant impacts beyond those already identified in Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.13.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to noise impacts. No substantial changes in the environment related to noise have occurred since certification of the EIR, and no substantial new significant noise sources have been identified within the vicinity of the 5850 Project that would result in new or more severe significant environmental impacts.

4.13.5 Mitigation Measures Addressing Impacts

As stated above, the 5850 Project would implement Mitigation Measure N1 from the Certified EIR. Implementation of this measure would ensure that the 5850 Project's impacts with respect to noise are less than significant.

4.13.6 Conclusion

Based on the above, no new significant noise impacts or a substantial increase in previously identified noise impacts would occur as a result of the 5850 Project. Therefore, the impacts to noise as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.14 Population and Housing

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
POPULATION AND HOUSING: Would the project:					
(a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Less Than Significant	No	No	No	No
(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Less Than Significant	No	No	No	No

4.14.1 Impact Determination in the EIR

As discussed in the Certified EIR, the majority of the population growth within the West Adams CPA would occur as a result of the revitalization of underutilized commercial and industrial areas through the strategic location of future development along major activity corridors and activity centers, and also through development around existing and future transit systems. However, the Certified EIR determined that these changes would not introduce unplanned infrastructure that would lead to population growth, such as new streets, street widening, or public transit, as all infrastructure had been previously evaluated in the adopted Community Plan or in the General Plan. The Certified EIR concluded that adoption and implementation of the Community Plan would not directly or indirectly lead to substantial population growth. Moreover, the Community Plan is consistent with the General Plan Framework and Housing Elements. Therefore, the Certified EIR determined that implementation of the Community Plan would result in less than significant impacts related to population growth.

As stated in the Certified EIR, no residential units are specifically proposed to be demolished, converted to market rate, or removed through other means as a result of the Community Plan. However, the increased residential capacity over existing conditions allowed by the Community Plan could cause temporary population displacement as new buildings are built in place of old ones, or existing buildings are renovated. The temporary nature of this impact, however, does not lead to a significant impact. Moreover, the Community Plan is consistent with the Housing Element, and the housing growth within the West Adams CPA would exceed its population growth, and therefore the Certified EIR concluded that there would be adequate housing to accommodate population growth in the area. Therefore, the Certified EIR determined that implementation of the Community Plan would result in less than significant impacts housing

growth.

Finally, as stated in the Certified EIR, within the West Adams CPA jobs are growing at a rate faster than the City. The Community Plan is consistent with City and SCAG goals and policies by seeking to retain viable existing industrial uses primarily within larger properties, and increasing the amount of commercial zoned land along the area's major east/west commercial corridors. Moreover, the Community Plan allows for an increase of more than 8,000 jobs. Therefore, the Certified EIR determined that implementation of the Community Plan would not contribute to a substantial jobs/housing imbalance, and impacts would be less than significant.

Mitigation Measures

Impacts related to population and housing were determined to be less than significant for the Community Plan, and therefore, no mitigation measures were required.

4.14.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The 5850 Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the 5850 Project's impacts with respect to population and housing were accounted for within the analysis contained in the Certified EIR.

The 5850 Project includes the development of approximately 344,947 square feet of office uses, consistent with the existing land use designation and zoning for the Project Site. While the 5850 Project includes a request to amend the CPIO for Parcel E with regards to maximum height (to 320 feet) and maximum individual floor height (up to 37 feet with atrium space up to 52 feet), the Project Site's land use designation of Hybrid Industrial, CM-2D-CPIO zoning and permitted floor area would remain unchanged. Therefore, no residential uses would be developed on the Project Site, and the 5850 Project would not result in a change in the population and housing estimates from those contemplated in the Certified EIR. As such, the 5850 Project would result in no impact with respect to population and housing. In addition, as the Project Site is not currently developed with residential uses, implementation of the 5850 Project would result in no impact with respect to population and housing displacement.

As stated above in the "Air Quality" section, the 5850 Project's office uses could accommodate approximately 1,380 employees. The Certified EIR accounted for an increase of more than 8,000 new jobs through implementation of the Community Plan. As the 5850 Project would be consistent with the Project Site's existing zoning and land use designations, the jobs created by the 5850 Project would be within the projections contained in the Certified EIR, and the 5850 Project would not contribute to a jobs/housing imbalance. Therefore, the 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Mitigation Measures

None required.

4.14.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

The 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.14.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to population and housing impacts. No substantial changes in the environment related to population and housing have occurred since certification of the EIR that would result in new or more severe significant environmental impacts.

4.14.5 Mitigation Measures Addressing Impacts

Because the EIR determined the Project would have a less than significant impact on population and housing impacts, no mitigation measures were required. Implementation of the 5850 Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.14.6 Conclusion

Based on the above, no new significant population and housing impacts or a substantial increase in previously identified population and housing impacts would occur as a result of the 5850 Project. Therefore, the impacts to population and housing as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.15 Public Services and Recreation

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
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	No	No	No	No
(b) Police protection?	Less Than Significant with Mitigation	No	No	No	Yes
(c) Schools?	Less Than Significant	No	No	No	No
(d) Parks?	Significant and Unavoidable	No	No	No	Yes
(e) Other public facilities?	Significant and Unavoidable	No	No	No	No

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
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?	Significant and Unavoidable	No	No	No	Yes
(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	No	No	No	No

4.15.1 Impact Determination in the EIR

The Certified EIR stated that implementation of the Community Plan could result in a net residential and employment population increase of up to 36,141 residents and 8,334 employees, respectively. It is anticipated that a proportionally greater demand for fire protection and emergency services will occur as a result of the greater number of residents, employees, and commercial activities within the West Adams CPA, creating an increased demand for services at LAFD Fire Station Numbers 26, 34, 43, 58, 66, 68, and 94. The Infrastructure and Public Services Element of the City of Los Angeles General Plan includes policies that require the evaluation of fire service needs based on existing and future conditions. Areas with deficient fire and emergency facilities are identified, and priority is given to the areas in need of upgraded facilities based on established fire protection standards. It is expected that the LAFD will maintain acceptable emergency response times with the provision of additional personnel and equipment as needed, for the duration of time that the Community Plan is in place. Therefore, the Certified EIR concluded that implementation of the Community Plan would result in less than significant impacts related to fire protection and emergency services.

As stated in the Certified EIR, implementation of the Community Plan would increase traffic conditions within the West Adams CPA, which could result in significant impacts to the circulation system. These traffic impacts could reduce police response times. However, with implementation of the Transportation Improvement and Mitigation Program (discussed below under "Transportation"), impacts to the circulation system would be reduced. In addition, the incremental increase in population occurring over the course of the 20-year planning period would ultimately result in an increase in demand for police protection services within the West Adams CPA. The Community Plan would implement Mitigation Measure PS1 to reduce impacts to police services. The Certified EIR concluded that impacts to police services would be less than significant after implementation of this mitigation measure.

With regard to impacts related to schools, any development associated with the Community Plan would be subject to California Government Code Section 65995, which would allow the LAUSD to collect impact fees from developers of new residential and commercial/industrial space. Furthermore, SB 50 protects schools from overcrowding as it authorizes schools to collect fees, which would offset costs associated with increasing school capacity, as a result of development projects. As stated in the Certified EIR, the provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts. Therefore, the Certified EIR concluded that implementation of the Community Plan would result in less than significant impacts related to schools.

With regard to impacts to parks and recreational facilities, the Certified EIR stated that the Community Plan would increase the population in the West Adams CPA, while the overall acreage of open space land uses would remain unchanged, and the acreage of public facilities land uses (which includes: agricultural uses, parking under freeways, fire and police stations, government buildings, public libraries, post offices, public health facilities, public elementary and secondary schools) would decrease slightly by seven acres, or two percent. Consequently, the

Certified EIR stated that the acreage of open space and public facilities within the West Adams CPA remains insufficient. Mitigation Measures PS2 through PS4 were provided with respect to parks and recreational facilities. However, the Certified EIR concluded that the population increase, due to implementation of the Community Plan, would result in significant and unavoidable impacts to public parks and recreational facilities.

With regard to libraries, the Certified EIR stated that the Community Plan would increase the demand for library services and resources of the Los Angeles Public Library (LAPL) System. The LAPL Branch Facilities Plan will continue to forecast future demand for library facilities and ensure that adequate facilities and related improvements are available to serve the new developments within the West Adams CPA. However, the majority of the projected increase in population would likely use the Washington Irving and Baldwin Hills Libraries, which would require the expansion of the existing libraries or the development of a new library. Therefore, the Certified EIR concluded that implementation of the Community Plan would result in a significant and unavoidable impact with respect to libraries.

Mitigation Measures

PS1 Discretionary projects in the CPIO or the Crenshaw Corridor Specific Plan shall be reviewed at the discretion of the Los Angeles Police Department (LAPD). Per department standards, the LAPD will determine if any additional crime prevention and security features would be available that are consistent with the development standards as applied to the design of the project. Any additional design features identified by the LAPD shall be incorporated into the project's final design and to the satisfaction of LAPD, prior to issuance of a Certificate of Occupancy for the project.

PS2 Subject to available resources and funding, the City shall prioritize the implementation of recreation and park projects in parts of the West Adams Community Plan Area with the greatest existing deficiencies.

PS3 Subject to available resources and funding, the City shall establish joint-use agreements with the Los Angeles Unified School District and other public and private entities which could contribute to the availability of recreational opportunities in the West Adams Community Plan Area.

PS4 Subject to available resources and funding, the City shall monitor appropriate recreation and park statistics and compare with population projections and demand to identify the existing and future recreation and park needs of the West Adams Community Plan Area.

4.15.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The 5850 Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the 5850 Project's impacts with respect to public services and recreation were accounted for within the analysis contained in the Certified EIR.

Fire

Construction

Construction activities associated with the 5850 Project may temporarily increase demand for fire protection and emergency medical services. Construction activities may also cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources from machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings.

To comply with California Department of Industrial Relations (Cal-OSHA) and State and City Fire and Building Code requirements, construction managers and personnel would be trained in fire prevention and emergency response, and fire suppression equipment specific to construction would be maintained on-site.[53] 5850 Project construction would comply with all applicable codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Thus, in light of City and State regulations and code requirements that would, in part, require personnel to be trained in fire prevention and emergency response, maintenance of fire suppression equipment, and implementation of proper procedures for storage and handling of flammable materials, construction impacts on fire protection and emergency medical services would be less than significant.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response, by adding construction traffic to the street network and by necessitating partial lane closures during street improvements and utility installations. These impacts, while potentially adverse, would be less than significant for the following reasons:

- Construction activities are temporary in nature and do not create continuing risks;
- General "good housekeeping" procedures employed by the construction contractors and the work crews (e.g., maintaining mechanical equipment, proper storage of flammable materials, cleanup of spills of flammable liquid) would minimize these hazards; and
- Partial lane closures would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

Impacts on traffic that could potentially affect emergency response are addressed through a Construction Traffic Management Plan (CTMP), which includes traffic management strategies for 5850 Project construction. The CTMP would outline and dictate how construction operations would be carried out, and would identify specific actions to reduce effects on the surrounding

[53] https://www.dir.ca.gov/title8/1920.html.

community. The CTMP would be based on the nature and timing of specific construction activities and other projects in the vicinity.

In addition to traffic, there are a number of factors that influence emergency response, including alarm transfer time, alarm answering and processing time, mobilization time, risk appraisal, geography, distance, traffic signals, and roadway characteristics. It is acknowledged that, even with the CTMP, the 5850 Project could incrementally increase traffic, which could potentially delay emergency response times. However, the 5850 Project's potential impacts are minimal given these other factors.

Overall, construction is not considered to be a high-risk activity, and the LAFD is equipped and prepared to deal with construction-related traffic and fires should they occur. Due to the limited duration of construction activities and compliance with applicable codes, 5850 Project construction would not be expected to adversely impact firefighting and emergency services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Therefore, impacts on fire protection services associated with construction of the 5850 Project would be less than significant.

Operation

Fire Flow

Prior to construction of the 5850 Project, the Water Operations Division of LADWP would perform a detailed fire-flow study at the time of permit review (Plan Check) in order to ascertain whether further water system or site-specific improvements would be necessary. In addition, the LAFD would review the plans for compliance with applicable City Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, thereby ensuring that the Project would not create any undue fire hazard. Thus, fire flow to the Project Site would be adequate, and the associated impact would be less than significant.

Response Distance

The Project Site would be served by Station No. 94, located at 4470 Coliseum Street, approximately two miles from the Project Site. LAFD's ability to provide adequate fire protection and emergency response services to a site is determined by the response distance and the degree to which emergency response vehicles can successfully navigate the given access ways and adjunct circulation system, which is largely dependent on roadway congestion along the response route. As the 5850 Project would be located more than 1.5 miles from Station No. 94, fire sprinklers would be required. Additionally, as stated previously, the 5850 Project would be required to comply with applicable City Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, and would be required to include features such as an emergency and standby power system, a fire command center, established emergency procedures, emergency stairways, automatic fire-extinguishing system, automatic smoke detection system, emergency voice/alarm communication system, manual alarm fire boxes, etc. Given the incorporation of fire sprinklers and other fire protection systems

within the proposed building, 5850 Project impacts related to response distance would be less than significant.

Emergency Access

The LAFD would review the 5850 Project plans for compliance with the Los Angeles Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, thereby ensuring that the 5850 Project would not create any undue fire hazard. The 5850 Project would include an emergency response plan that would address the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, and locations of nearest hospitals and fire departments. Through compliance with applicable provisions of the Fire Code, 5850 Project impacts related to emergency access would be less than significant.

Conclusion

Consistent with the ruling of *City of Hayward v. Board Trustees of California State* University (2015) 242 Cal.App.4th 833 and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. If LAFD determines that new facilities are necessary at some point in the future, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332 and would not be expected to result in significant impacts[54]. Further analysis, including a specific location, would be speculative and beyond the scope of this document. Thus, the 5850 Project impacts on fire protection and emergency medical services would be less than significant.

Police

Construction

Although there is the potential for 5850 Project construction to create an increase in demand for police protection services, the 5850 Project would provide security on the Project Site as needed and appropriate during the construction process. This security could include perimeter fencing, lighting, and security guards, thereby reducing the demand for LAPD services. The specific type and combination of construction site security features would depend on the phase of construction. The Project Applicant would install temporary construction fencing to secure the Project Site during the construction phase to ensure that valuable materials (e.g., building

[54] Although an EIR was prepared for the construction of Fire Station 39, the EIR concluded there would be no significant impacts. See, Notice of Determination for Van Nuys Fire Station 39, at http://eng2.lacity.org/techdocs/emg/docs/vannuys_fs39/NOD_160701.pdf

supplies and metals such as copper wiring), as well as construction equipment are not easily stolen or abused.

During construction, emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Lights and other identifying noises compel traffic to pull to the side where available to provide access through traffic. Although minor traffic delays due to potential lane closures could occur during construction, particularly during the construction of utilities and street improvements, impacts to police response times are considered to be less than significant for the following reasons:

(1) Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAPD;

(2) Construction impacts are temporary in nature and do not cause lasting effects; and

(3) Partial lane closures, if determined to be necessary, would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

Construction of the 5850 Project would not affect the LAPD's ability to respond to emergencies to the extent that there is no need for any additional new or expanded police facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the LAPD. For these reasons, 5850 Project construction impacts on police services would be less than significant.

Operation

The 5850 Project would include security features such as appropriate lighting in and around the proposed office building and controlled access to the subterranean parking garage. The 5850 Project would include defensible spaces designed to reduce opportunity crimes and ensure safety and security. In addition, the lighting and landscaping design would ensure high visibility. Finally, the 5850 Project would comply with Mitigation Measure PS1 from the Certified EIR, which would ensure that the 5850 Project incorporates all crime prevention features recommended by the LAPD. Emergency access to the Project Site would be provided by the existing street system. The 5850 Project's commercial (office) nature and associated lower demand for police services, along with the provision of on-site security features, coordination with LAPD, and incorporation of crime prevention features, would not require the provision of new or physically altered police stations in order to maintain acceptable service ratios or other performance objectives for police protection. Additionally, the 5850 Project would also contribute to the General Fund, a portion of which is allocated to the LAPD and other public services. Moreover, consistent with *City of Hayward v. Trustees of California State University* (2015) 242

Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate. Therefore, 5850 Project impacts related to police protection services would be less than significant.

Schools

The 5850 Project includes development of the Project Site with an office building, which would not result in a direct demand for school services. Additionally, pursuant to the California Government Code Section 65995, the Project Applicant would be required to pay school fees established by the Los Angeles Unified School District (LAUSD), payment of which in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Therefore, 5850 Project impacts to school services would be less than significant.

Parks and Recreation

The 5850 Project includes development of the Project Site with an office building. Employees generated by the proposed office uses would not typically enjoy long periods of time during the workday to visit parks, and they would be more likely to use parks near their homes during non-work hours. In addition, the 5850 Project includes approximately 47,854 square feet of landscaping at the ground level, which is over 24 percent coverage of the Project Site and which creates a park-like venue that surrounds the proposed office building. This would include landscaping and pathways, paseos, and community seating and gathering areas. The Certified EIR stated that implementation of the Community Plan would create additional demand at park and recreational facilities, and concluded that there would be a significant and unavoidable impact with respect to park and recreational facilities. The demand for parks and recreational facilities in the City is generally determined based on the number of residents a project would generate and the City's parkland acreage-to-population ratios are based on residential population and not employee population. However, the 5850 Project includes only commercial uses, which would not generate a residential population that would result in additional demand for parks and recreational facilities. Instead, the 5850 Project would generate employees who would not typically enjoy long periods of time during the workday to visit parks. In addition, the 5850 Project would include a park-like venue surrounding the proposed office building that would provide recreational opportunities during lunchtime or other breaks from work, and which would serve the needs of the 5850 Project. For these reasons, the 5850 Project would not result in additional demand for park and recreational facilities, and the 5850 Project's impacts would be less than significant.

In addition, the 5850 Project does not include the construction of recreational facilities outside of the Project Site boundaries, such as a park. Therefore, the 5850 Project does not involve the construction of recreational facilities that would have an adverse physical effect on the environment, and no impact would occur.

Libraries

The 5850 Project includes development of the Project Site with an office building. Employees generated by the proposed office uses would not typically enjoy long periods of time during the workday to visit libraries, and they would be more likely to use libraries near their homes during non-work hours. In addition, it is likely that employees working in the proposed office building would have individual access to internet service, which provides information and research capabilities that studies have shown to reduce demand at physical library locations.[55,56,57] The Certified EIR stated that implementation of the Community Plan would create additional demand at the Washington Irving and Baldwin Hills Libraries, and concluded that there would be a significant and unavoidable impact with respect to library facilities. However, as the 5850 Project includes only commercial uses, it would not result in additional demand for library facilities, and the 5850 Project's impacts with respect to library facilities would be less than significant.

Mitigation Measures

The 5850 Project would implement Mitigation Measure PS1 from the Certified EIR. Mitigation Measures PS2 through PS4 are directed to the City and not at specific development projects. Therefore, Mitigation Measures PS2 through PS4 would not be applicable to the 5850 Project.

4.15.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

The 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.15.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to public services impacts. No substantial changes in the environment related to public services have occurred since certification of the EIR, and no substantial new significant noise sources have been identified within the vicinity of the 5850 Project that would result in new or more severe significant environmental impacts.

4.15.5 Mitigation Measures Addressing Impacts

[55] "To Read or Not To Read", see pg. 10: "Literary reading declined significantly in a period of rising Internet use": http://www.nea.gov/research/toread.pdf.

[56] "How and Why Are Libraries Changing?" Denise A. Troll, Distinguished Fellow, Digital Library Federation: http://old.diglib.org/use/whitepaper.htm.

[57] "Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies", Carol Tenopir: http://www.clir.org/pubs/reports/pub120/contents.html.

As stated above, the 5850 Project would implement Mitigation Measure PS1 from the Certified EIR. Mitigation Measures PS2 through PS4 are directed to the City and not at specific development projects. Therefore, Mitigation Measures PS2 through PS4 would not be applicable to the 5850 Project.

4.15.6 Conclusion

Based on the above, no new significant public services impacts or a substantial increase in previously identified public services impacts would occur as a result of the 5850 Project. Therefore, the impacts to public services as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.16 Transportation

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
TRANSPORTATION / TRAFFIC: Would the project:					
(a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Significant and Unavoidable	No	No	No	No
(b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?	Significant and Unavoidable	No	No	No	No
(c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less Than Significant	No	No	No	No
(d) Result in inadequate emergency access?	Less Than Significant	No	No	No	No

This section is based on the Certified EIR and the following items, which are included as **Appendix F** to this Addendum:

F-1 Memorandum of Understanding, LADOT, February 24, 2020.

F-2 Transportation Assessment, Gibson Transportation Consulting, Inc., June 2020.

F-3 LADOT Letter, July 8, 2020.

F-4 Traffic Evaluation of Community Plan Relative to 5850 Jefferson Boulevard, Gibson Transportation Consulting, Inc., February 25, 2020.

4.17.1 Impact Determination in the EIR

The Community Plan includes a Transportation Improvement and Mitigation Program (TIMP) that consists of Bicycle Facility Improvements, Transportation Demand Management (TDM) Strategies, a Residential Neighborhood Traffic Management Plan, Transportation Systems Management (TSM) Strategies, Highway Infrastructure Improvements, Street System Classification Changes, and Public Transit Improvements. These plans are designed to reduce traffic impacts and improve the circulation system within the West Adams CPA. However, the Certified EIR determined that implementation of the Community Plan would result in a significant and unavoidable impact related to the circulation system.

Additionally, the significant impact criteria established by the Congestion Management Program

(CMP) states that a project would generate significant regional freeway impacts if the project increases traffic demand on a CMP facility by two percent of capacity (V/C > 0.02), causing or worsening LOS F (V/C> 1.00). As stated in the Certified EIR, the implementation of the Community Plan would generate significant regional freeway impacts at one freeway monitoring station due to an increase of traffic demand greater than two percent that would worsen an existing LOS F. Therefore, the Certified EIR concluded that implementation of the Community Plan would result in a significant and unavoidable impact related to the CMP.[58]

Existing emergency response routes are maintained in their existing locations and all related development would be designed in accordance with City standards, which include provisions that address emergency access. In addition, the proposed West Adams TIMP also includes highway infrastructure improvements and street system classification changes that facilitate emergency access. Therefore, the Certified EIR concluded that implementation of the Community Plan would result in less than significant impacts related to emergency access.

As stated in the Certified EIR, the West Adams CPA is currently served by 33 Metro bus lines, six LADOT bus lines, and four Santa Monica bus lines. Implementation of the Community Plan could intensify development around proposed TOD areas, which would allow for an increase in both jobs and housing. Locating jobs near housing can help reduce commutes, increase walking and biking rates, thereby creating a benefit for public health. The proposed West Adams TIMP also includes a number of public transit improvements to encourage and facilitate transit ridership and proposes to increase the number of bike lanes along certain corridors. Therefore, the Certified EIR concluded that implementation of the Community Plan would result in less than significant impacts related to public transit, bicycle, and pedestrian facilities.

4.16.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The 5850 Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the 5850 Project's impacts with respect to transportation were accounted for within the analysis contained in the Certified EIR.

Methodology

SB 743, made effective in January 2014, required the Governor's Office of Planning and Research to change the CEQA Guidelines regarding the analysis of transportation impacts. Under SB 743, the focus of transportation analysis shifts from driver delay (level of service [LOS]) to VMT, with the intent of reducing greenhouse gas emissions (GHG), creating multimodal networks, and promoting mixed-use developments.

[58] As of August 28, 2019, the provisions of the CMP no longer apply to any of the jurisdictions in Los Angeles County, including the City of Los Angeles.

On July 30, 2019, the Los Angeles City Council approved revisions to the City's transportation analyses approach to incorporate new screening procedures and thresholds compliant with SB 743. LADOT's Transportation Assessment Guidelines (TAG) defines and provides the required methodology of analyzing a project's transportation impacts in accordance with SB 743.

Per the TAG, the CEQA transportation analysis contains the following thresholds for identifying significant impacts:

- *Threshold T-1: Conflicting with Plans, Programs, Ordinances, or Policies*
- *Threshold T-2.1: Causing Substantial Vehicle Miles Traveled (VMT)*
- *Threshold T-2.2: Substantially Inducing Additional Automobile Travel*
- *Threshold T-3: Substantially Increasing Hazards Due to a Geometric Design Feature or Incompatible Use*
- *Threshold T-4: Would the project result in inadequate emergency access?*

These thresholds are reviewed and analyzed below.

Conflicting with Plans, Programs, Ordinances, or Policies

Table 2.1-1 of the TAG provides the City plans, policies, programs, ordinances, and standards relevant in determining project consistency. Table 2.1-2 of the TAG provides a list of questions to help guide whether a project conflicts with the City's plans, programs, ordinances, or policies. As discussed below, the 5850 Project is consistent and does not conflict with the City's plans, policies, programs, ordinances, and standards listed in Table 2.1-1 of the TAG. Therefore, the 5850 Project would not result in a significant impact under Threshold T-1. Detailed discussions of the plans, programs, ordinances, or policies related to the 5850 Project are provided below.

Mobility Plan

As noted in the TAG, the Transportation Element of the City's General Plan, the "Mobility Plan 2035," offers a comprehensive vision and set of policies and programs the City aims to achieve to provide streets that are safe and convenient for all users. The Mobility Plan was adopted as an update to the City's General Plan Transportation Element (last adopted in 1999) and provides the foundation for achieving a balance of infrastructure for all travel modes. As the City's transportation network continues to evolve in the context of environmental constraints, public health issues, regional inequity, and congestion, the Mobility Plan addresses many of these issues through policy initiatives. The Mobility Plan combines "complete street" principles with the following five goals that define the City's mobility priorities:

1. Safety First: Design and operate streets in a way that enables safe access for all users, regardless of age, ability, or transportation mode of choice.

2. World Class Infrastructure: A well-maintained and connected network of streets, paths, bikeways, trails, and more provides Angelenos with the optimum variety of mode choices.

3. Access for All Angelenos: A fair and equitable system must be accessible to all and must pay particularly close attention to the most vulnerable users.

4. Collaboration, Communication, and Informed Choices: The impact of new technologies on our day-to-day mobility demands will continue to become increasingly important to the future. The amount of information made available by new technologies must be managed responsibly in the future.

5. Clean Environments and Healthy Communities: Active transportation modes such as bicycling and walking can significantly improve personal fitness and create new opportunities for social interaction, while lessening impacts on the environment.

These goals can create opportunities to address the inequities in the City that have limited quality of life in low-income communities. By placing a citywide emphasis on safety, access, and health, the City can begin to address disadvantage by connecting people to more prospects of success through mobility.

The 5850 Project's urban location and site access do not conflict with implementation of the goals of the Mobility Plan, as the 5850 Project provides employment in proximity to regional transit connections which fulfills a primary goal of bringing people from longer distances without requiring a personal vehicle commute. The 5850 Project's primary driveway would be located on Jefferson Boulevard, a designated Modified Avenue II in the Mobility Plan, at the southern edge of the property, and the 5850 Project's secondary driveway for loading/unloading would be located at the existing driveway on the northern edge of the property. Jefferson Boulevard is part of the Bicycle Network and has an existing bicycle lane on both sides of the street, which will remain with development of the 5850 Project.

A 10-foot required dedication along the Project Site's Jefferson Boulevard frontage was previously recorded by the City in November 2018. The Applicant is proposing to utilize this area as a part of the 5850 Project for pedestrian and streetscape enhancement and additional landscaping.

A new curb cut would be provided on Jefferson Boulevard at the south end of the Project frontage to accommodate the proposed new Project driveway. This driveway would be located approximately 1,000 feet south of National Boulevard and 700 feet north of Obama Boulevard. No other mid-block crossings exist in this area. The curb cut would be designed in accordance with LADOT guidelines to ensure compliance with existing code requirements for intersection spacing, pedestrian, and vehicular safety. Having met traffic signal warrants, the proposed Project driveway would be signalized with continental crosswalks for high visibility crossings of pedestrians (north/south) and bicyclists (north/south and east/west). The west side of Jefferson Boulevard abuts Ballona Creek and does not include a sidewalk but does provide a southbound

bicycle lane. Additionally, the Project Site includes ample pedestrian and bicycle open space as part of the designed park-like features.

The 5850 Project does not propose repurposing existing curb space and does not propose narrowing or shifting existing sidewalk placement or paving, narrowing, shifting, or removing an existing parkway.

Although the 5850 Project would introduce a new driveway connected to a Modified Avenue II, measures would be taken to ensure the safety of all road users, including the signalization of the intersection with high-visibility crosswalks. Located close to regional transit, the 5850 Project can induce a workforce from a variety of communities, while providing a safe, clean, healthy, and accessible environment. Therefore, the 5850 Project would not be in conflict with the stated goals of Mobility Plan, nor does the 5850 Project interfere with the implementation of Mobility Plan elements.

Specific Plans

The Project is not located within an area currently governed by a Specific Plan and, therefore, this does not apply to the Project.

Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan introduces guidelines for the City to follow to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues. The components of this plan focus on health and wellness through increased quality of life, economic development, equity and environmental justice, housing and community stability, mobility, and open space.

Located close to regional transit connectors with enhanced pedestrian streetscapes to entice transit use, the 5850 Project is able to promote economic development by expanding job opportunities to all communities. By providing open park-like spaces with accessible and connected pedestrian and bicycle passages, the 5850 Project encourages outdoor activities, increases mobility options for transit, walking, bicycling, and provides jobs to contribute to a stable community.

Therefore, elements of the 5850 Project promote many of the goals and objectives of the Plan for a Healthy Los Angeles.

Land Use Element of the General Plan

The City General Plan's Land Use Element contains 35 Community Plans that establish specific goals and strategies for the various neighborhoods across Los Angeles. As detailed in the *West Adams – Baldwin Hills – Leimert Community Plan*, the Project Site sits along Jefferson Boulevard, identified as a designated Modified Avenue II, and is adjacent to the intersection of

the North Project Driveway & Jefferson Boulevard (Intersection #8). The Project Site is designated in the Community Plan as a Hybrid Industrial Zone.

The Community Plan lists the following general site and building design industrial guidelines to be considered for a Hybrid Industrial Zone development:

> *G80. Public frontages, facades and site edges should be attractive and well maintained.*
>
> *G81. Visibility for security purposes should be balanced with screening of stored goods and industrial activities.*
>
> *G82. Pedestrian access paths to public entrances should be delineated clearly from vehicular and truck access.*
>
> *G83. All truck turning movements necessary to enter or exit loading docks should be accommodated entirely within the site.*
>
> *G84. Driveways and curb cuts at the property edge should be the minimum number and size. Wherever possible, driveways should be shared in new developments.*
>
> *G85. Visitor parking should be provided separately from employee and truck parking or loading areas.*
>
> *G86. New buildings should be setback from the public sidewalk to provide a landscape buffer.*
>
> *G87. When abandoned rights-of-way are included in a redeveloped industrial site, they should be integrated as passive or active outdoor space.*

The 5850 Project aligns with each of these goals and policies of the hybrid industrial land uses within the Community Plan with attractive frontages, placing parking decks below grade, performing loading activities occurring wholly on-site, minimizing the number of required driveways and providing potential future shared driveway options, separating individual vehicles from large trucks, constructing buildings setback with a landscape buffer, and maintaining ample outdoor open space.

West Adams-Baldwin Hills-Leimert CPIO

The CPIO District is a specialized zoning tool used in part to encourage the creation of pedestrian-friendly, multi-modal transit villages where jobs, housing, goods and services, as well as access to open space, are all located within walking distance of station areas. The CPIO District can help reinforce existing community character while directing new density to neighborhoods that can accommodate growth.

A complete traffic analysis was conducted to compare the 5850 Project within the context of the CPIO and is included as Appendix F-4 to this Addendum. The results of the analysis demonstrate that the 5850 Project is in substantial conformance to the assumptions made by

the Community Plan for zoning and density, as analyzed in the EIR certified by the City on June 29, 2016.

LAMC Section 12.21.A.16

LAMC Section 12.21.A.16 details the bicycle parking requirements for new developments. However, new bicycle parking requirements have been developed by the City, and the 5850 Project would follow the new requirements set out by the City which requires office projects to provide short-term bicycle parking at 1 per 10,000 square feet and long-term spaces at 1 per 5,000 square feet. Per the updated LAMC, the 5850 Project's proposed 344,947 square feet of office would require a total of 35 short-term and 69 long-term bicycle parking spaces.

The 5850 Project's proposed 40 short-term and 79 long-term bicycle spaces meet the LAMC requirements for on-site bicycle parking supply.

LAMC Section 12.26J

LAMC Section 12.26J, the Transportation Demand Management (TDM) Ordinance, establishes trip reduction requirements for non-residential projects in excess of 25,000 square feet. The 5850 Project would incorporate TDM measures as part of the Project design aimed at encouraging use of alternative transportation modes consistent with the requirements set forth in the TDM Ordinance.

Vision Zero Action Plan / Vision Zero Corridor Plans

The primary goal of Vision Zero is to eliminate traffic deaths in the City of Los Angeles by 2025 through a number of strategies, including modifying the design of streets to increase safety. Vision Zero implements projects that are designed to increase safety for the most vulnerable road users. The City has identified numerous streets as part of the High Injury Network where City projects will be targeted. The City has also created an Action Plan, which identifies the types of improvements that will be implemented

The Project Site is not located adjacent to a street identified on the High Injury Network. However, within the Study Area, Venice Boulevard (approximately 1 mile west of the Project Site) and La Cienega Boulevard (approximately 0.4 miles east of the Project Site) are identified as part of the High Injury Network. As of February 2020, no Vision Zero improvements have been made on these streets within the Study Area.

Because the 5850 Project is not located on the high injury network and does not propose modifications for streets designated in the High Injury Network, no conflict with the Vision Zero plan would occur.

Streetscape Plans

Streetscape plans are a collaboration between LADOT and the Los Angeles Department of City Planning to provide pedestrian friendly corridors and an enhanced sense of identity in various

local areas throughout the City. No streets within the Study Area have a proposed Streetscape Plan.

Citywide Design Guidelines for Residential, Commercial, and Industrial Development

Citywide Design Guidelines incorporates urban design principles pertaining to pedestrian-first design that serves to reduce VMT. The three primary guidelines of this document are: (1) to promote a safe, comfortable and accessible pedestrian experience for all; (2) to carefully incorporate vehicular access such that it does not degrade the pedestrian experience; and (3) to design projects to actively engage with streets and public space and maintain human scale.

While the 5850 Project would introduce a new driveway along Jefferson Boulevard, a designated Modified II in the Mobility Plan, this driveway would be signalized and provide safe crossings for pedestrians and cyclists. Future development adjacent to the 5850 Project may also be eligible to share this driveway to further limit curb-cuts.

Additionally, the Project Site is located on a corner lot adjacent to Jefferson Boulevard & North Project Driveway (Intersection #8), which provides access along the north edge of the Project Site and is expected to accommodate low traffic volumes, provide 5850 Project loading wholly within the Project Site boundary to minimize activity and conflicts with pedestrians, and provide secondary access relief.

The 5850 Project promotes pedestrian-first accommodations through park-like frontages, high visibility connections, increased sidewalk passages through the open space, and proximity to transit. No transportation elements of the 5850 Project are in conflict with the Citywide Design Guidelines.

Walkability Checklist

City of Los Angeles Walkability Checklist – Guidance for Entitlement Review serves as a guide for creating improved conditions for pedestrians to travel and contribute to the overall walkability of the City and includes the following topics:

- Sidewalks
- Crosswalks/Street Crossings
- On-Street Parking
- Utilities
- Building Orientation
- Off-Street Parking and Driveways
- On-Site Landscaping

- Building Façade
- Building Signage and Lighting

The 5850 Project incorporates many of the recommended strategies applicable to office developments, including but not limited to providing continuous and adequate sidewalks along the Project Site, designing direct primary entrances for pedestrians to be visible and ADA accessible, close proximity to mass transit, and locating off-street parking away from the adjacent major street. The 5850 Project's building orientation provides an ease of accessibility. On-site landscaping adds visual interest and differentiates the public pedestrian areas from the private zones. Signage and lighting is expected to create visual cues for pedestrians, complement the character of surrounding buildings, and enhance pedestrian safety and comfort. Therefore, the 5850 Project is consistent with the Walkability Checklist.

LADOT Transportation Technology Strategy – Urban Mobility in a Digital Age

The LADOT transportation technology strategy, based on *Urban Mobility in a Digital Age: A Transportation Technology Strategy for Los Angeles*, is designed to ensure the City stays on top of emerging transportation technologies as both a regulator and a transportation service provider. This strategy document includes the following goals:

- Data as a Service: Providing and receiving real-time data to improve the City's ability to serve transportation needs.
- Mobility as a Service: Improving the experience of mobility consumers by encouraging partnerships across different modes and fostering clear communication between transportation service providers.
- Infrastructure as a Service: Re-thinking how the City pays for, maintains, and operates public, physical infrastructure to provide more transparency.

The policy recommendations for this technology strategy include creating robust communications infrastructure, gathering crowd-sourced data, and implementing future automation, for which the 5850 Project is not directly involved; however some of the ancillary support issues such as reducing/eliminating parking minimums, establishing efficient pedestrian corridors, and providing better connections with transit (i.e., first-mile/last-mile), the 5850 Project is assisting with these objectives and does not interfere with implementing the general policy recommendations and/or pilot proposals set forth by this document.

Mobiliy Hub Reader's Guide

Mobility Hubs: A Reader's Guide provides guidance for enhancing transportation connections and multi-modal improvements in proximity to new or existing transit stations, focusing on mobility hub amenities such as bicycle connections (bike share, bike parking, bike facilities), vehicle connections (ride share opportunities, car share services, electronic vehicle stations),

bus infrastructure (layover zones, shelters) information signage (wayfinding, real-time information, wi-fi connectivity), support services (ambassadors, waiting areas, safety/security, sustainable approach), active uses (retail, public spaces), and pedestrian connections (to the hub and at the hub).

The 5850 Project incorporates several of these components, including: (1) short-term and long-term bicycle parking which enhances the first-mile/last-mile connectivity to transit; (2) electronic vehicle charging stations to encourage alternative fuel vehicles; and (3) active public open spaces that are well-lit with adequate wayfinding for the safety and comfort of pedestrians. Therefore, the 5850 Project would not conflict with the Mobility Hub Reader's Guide.

LADOT Manual of Policies and Procedures (Design Standards)

Manual of Policies and Procedures provides plans and requirements for traffic infrastructure features in the City, such as roadway striping and other markings, signage, on-street parking, crosswalks, and turn lanes. The 5850 Project is not seeking exemptions from any of the transportation policies and procedures contained in this document. Additionally, the 5850 Project would comply with all applicable LADOT design standards.

Conclusion - Consistency with Plans and Policies

The 5850 Project is consistent with the City plans and policies listed in Table 2.1-1 of the TAG along with the described documents above; therefore, the 5850 Project would not result in a significant impact under Threshold T-1.

Causing Substantial Vehicle Miles Traveled

Threshold T-2.1 states that a residential project would result in a significant VMT impact if it would generate household VMT per capita exceeding 15% below the existing average household VMT per capita for the City's Area Planning Commission (APC) area in which a project is located. Similarly, a commercial project would result in a significant VMT impact if it would generate work VMT per employee exceeding 15% below the existing average work VMT per employee for the APC area in which the project is located.

The thresholds of significance further point out that, generally, projects located within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact (*City of Los Angeles CEQA Transportation Thresholds*, page 4, footnote 3). The 5850 Project is located less than one-half mile from an existing major transit stop.

The VMT analysis presented below was conducted in accordance with the TAG, and in compliance with State requirements under SB 743.

VMT Methodology

In accordance with SB 743, LADOT developed *City of Los Angeles VMT Calculator Version 1.2* (VMT Calculator) in November 2019 to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits, which are based on the following types of one-way trips:

- Home-Based Work Production: trips to a workplace destination originating from a residential use at a project site.
- Home-Based Other Production: trips to a non-workplace destination (e.g., retail, restaurant, etc.) originating from a residential use at a project site.
- Home-Based Work Attraction: trips to a workplace destination at a project site originating from a residential use.

As detailed in *City of Los Angeles VMT Calculator Documentation*, the household VMT per capita threshold applies to home-based work production and home-based other production trips, and the work VMT per employee threshold applies to home-based work attraction trips, as the location and characteristics of residences and workplaces are often the main drivers of VMT.

The LADOT TAG identifies a daily household VMT per capita impact criteria of 6.0 and a work VMT per employee impact criteria of 11.6 (both of these values are 15% below the base VMT) for the South Los Angeles APC, in which the 5850 Project is located. The 5850 Project use-type does not contribute to household VMT as there are no long-term residential uses proposed on-site. Therefore, should the 5850 Project's average work VMT per employee be equal to or lower than 11.6, the 5850 Project's overall VMT impact would be less than significant.

Mixed-Use Development Methodology

As detailed in *City of Los Angeles VMT Calculator Documentation*, the VMT Calculator accounts for the interaction of land uses within a mixed-use development and considers the following sociodemographic, land use, and built environment factors for the Project area:

- The project's jobs/housing balance
- Land use density of the project
- Transportation network connectivity
- Availability of and proximity to transit
- Proximity to retail and other destinations
- Vehicle ownership rates
- Household size

TDM Measures

Additionally, the VMT Calculator measures the reduction in VMT resulting from a project's incorporation of TDM measures as project design features or mitigation measures. The following seven categories of TDM measures are included in the VMT Calculator:

1. Parking
2. Transit
3. Education and Encouragement
4. Commute Trip Reductions
5. Shared Mobility
6. Bicycle Infrastructure
7. Neighborhood Enhancement

TDM measures within each of these categories have been empirically demonstrated to reduce trip-making or mode choice in such a way as to reduce VMT.

5850 Project VMT Analysis

The City's VMT Calculator was used to calculate the 5850 Project's VMT to compare against the City's significance thresholds. The VMT Calculator was modeled with approximately 344,947 square feet of office land use as the primary input. The 5850 Project includes the following design features:

Price Workplace Parking. Tenant parking would be rented separately from the building space, which "unbundles" the cost of obtaining assigned parking spaces from the cost of leasing office space. Unbundling parking is an essential step toward getting people to understand the economic cost of parking. Without unbundled parking, tenants often assume parking is free.

Bicycle Parking per LAMC. The 5850 Project would provide LAMC-required bicycle parking and additional bicycle facilities and amenities within the subterranean parking structure.

5850 Project VMT with Proposed Design Enhancements

Based on the VMT Calculator, the 5850 Project is estimated to generate 2,588 daily vehicle trips, which calculates to 24,991 daily VMT. This value results in 10.7 work VMT per employee, which is below the 11.6 South Los Angeles APC threshold. Under this base condition, the 5850 Project does not have a significant VMT impact and no mitigation measures would be required.

While the included design strategies (Price Workplace Parking and Bicycle Parking per LAMC) are capable of reducing VMT, other combinations of TDM strategies can be equally effective. The 5850 Project is committed to meeting the South Los Angeles APC threshold of 11.6 work

VMT per employee through the use of TDM strategies and may determine that future technologies or other infrastructure could be substituted as viable VMT reducers without the constraints of specific entitlement conditions that would eliminate such flexibility.

Substantially Inducing Additional Automobile Travel

The intent of Threshold T-2.2 is to assess whether a transportation project would induce substantial VMT, such as the addition of through traffic lanes on existing or new highways, including general purpose lanes, high-occupancy vehicle lanes, peak period lanes, auxiliary lanes, and lanes through grade-separated interchanges.

The 5850 Project does not propose a transportation project that would induce automobile travel and does not propose additional traffic lanes. No additional lanes are recommended for access as all provisions for vehicles can utilize the current pavement widths. Therefore, further evaluation will not be required, and the 5850 Project would not result in a significant impact under Threshold T-2.2.

Substantially Increasing Hazards Due to a Geometric Design Feature or Incompatible Use

Further evaluation is required for projects that propose new access points or modifications along the public right-of-way (i.e., street dedications) under Threshold T-3. A review of project access points, internal circulation, and parking access would determine if a project would substantially increase hazards due to geometric design features, including safety, operational, or capacity impacts. Vehicular access to the Project Site would be provided via a new driveway along Jefferson Boulevard and an existing driveway on the northern property line. Pedestrian access to the 5850 Project would be provided along Jefferson Boulevard. Street dedications on Jefferson Boulevard along the 5850 Project frontage allow the 5850 Project to meet City standards for sidewalks and roadway widths.

The section of Jefferson Boulevard along which the 5850 Project's primary access driveway is located is constructed with four existing travel lanes, two in each direction, and bicycle lanes on each side, consistent with the Mobility Plan designation. No exceptional horizontal or vertical curvatures exist along this section of roadway that would create sight distance issues for 5850 Project traffic utilizing the proposed driveway.

Parking is prohibited on the both sides of the street on Jefferson Boulevard. No unusual or new obstacles are presented in the 5850 Project design that would be considered hazardous to motorized vehicles, non-motorized vehicles, or pedestrians. The proposed driveway will be subject to review by LADOT. A new traffic signal with crosswalks at this proposed driveway location would improve visibility of the proposed driveway and improve the safety of crossings for pedestrians, bicycles, and vehicles.

Based on the site plan review and design, the 5850 Project does not present any geometric design features that would substantially increase hazards as it relates to traffic movement,

mobility, or pedestrian accessibility, and thus, 5850 Project impacts are considered less than significant.

Emergency Access

This threshold reviews whether or not a project's elements would have a detrimental effect on emergency vehicle response times. Vehicular access to the Project Site would be maintained from Jefferson Boulevard at the North Project Driveway (for loading and secondary access), with a new signalized, primary driveway on the southern edge of the 5850 Project. The 5850 Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access both during construction as well as after completion of the 5850 Project. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. The 5850 Project also would not include the installation of barriers that could impede emergency vehicle access both during and post-construction. Drivers of emergency vehicles are also trained to utilize center turn lanes, or travel in opposing through lanes (on two-way streets) to pass through crowded intersections or streets. Accordingly, the respect entitled to emergency vehicles and driver training allows emergency vehicles to negotiate typical street conditions in urban areas. As such, emergency access to the Project Site and surrounding area would be maintained both during and post-construction. Therefore, the 5850 Project would not result in inadequate emergency access during construction or operation, and, as such, impacts to emergency access during construction and operation of the 5850 Project would be less than significant.

4.16.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

The 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.16.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to transportation impacts. No substantial changes in the environment related to transportation have occurred since certification of the EIR, and no substantial new significant traffic sources have been identified within the vicinity of the 5850 Project that would result in new or more severe significant environmental impacts related to transportation.

4.16.5 Mitigation Measures Addressing Impacts

None required.

4.16.6 Conclusion

Based on the above, no new significant transportation impacts or a substantial increase in previously identified transportation impacts would occur as a result of the 5850 Project. Therefore, the impacts to transportation as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.17 Tribal Cultural Resources

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
TRIBAL CULTURAL RESOURCES: Would the project:					
(a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, please, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
(i) Listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	Less Than Significant with Mitigation	No	No	No	No
(ii) A resource determined by the lead agency in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	Less Than Significant with Mitigation	No	No	No	Yes

4.17.1 Impact Determination in the EIR

AB 52 went into effect on July 1, 2015, and requires that for a project for which a Notice of Preparation (NOP) for a Draft EIR was filed on or after July 1, 2015, the lead agency is required to consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of a proposed project, if: (1) the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area; and (2) the tribe requests consultation, prior to the release of a negative declaration, mitigated negative declaration or environmental impact report for a project. The NOP for the West Adams New

Community Plan EIR was released on February 1, 2008, and therefore, the lead agency was not required to comply with the requirements of AB 52.

AB 52 also required an update to Appendix G of the CEQA Guidelines to include questions related to impacts to tribal cultural resources. Changes to Appendix G were approved by the Office of Administrative Law on September 27, 2016. The Final EIR was released in May of 2016, and therefore did not include responses to the updated Appendix G questions related to tribal cultural resources.

Nevertheless, the issues related to tribal cultural resources were addressed within the Cultural Resources section of the Certified EIR. As stated in the Certified EIR, there are no known formal cemeteries within the West Adams CPA and no historical or prehistoric human remains are known to occur. The West Adams CPA is highly disturbed and unmarked cemeteries or graves that may have existed at the surface have likely been disturbed by past development. The Certified EIR determined that the potential to disturb any human remains interred outside of formal cemeteries within the West Adams CPA is considered low, given the level of past human activity. However, it is possible that unknown human remains could be located on sites developed under the Community Plan. Mitigation Measure CR10 would reduce impacts to human remains. Therefore, with implementation of Mitigation Measure CR10, the Certified EIR determined that implementation of the Community Plan would result in a less than significant impact related to human remains.

Mitigation Measures

CR10 Any approval of a Discretionary project or *"Active Change Area Project"* shall ensure that if human remains are unearthed at a project site during construction, work at the specific construction site at which the remains have been uncovered shall be suspended, and the City of Los Angeles Public Works Department and County coroner shall be immediately notified. No further disturbance shall occur until the Los Angeles County Coroner has made the necessary findings as to origin and disposition in accordance with California Health and Safety Code Section 7050.5. If the remains are determined to be those of a Native American, the Native American Heritage Commission (NAHC) in Sacramento shall be contacted before the remains are removed in accordance with Section 21083.2 of the California Public Resources Code.

4.17.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Project Site currently contains a surface parking lot and an existing media production building that was built in 2017, and that would remain on-site. The 5850 Project would develop an approximately 344,947 square foot office building in place of the existing surface parking lot. The Project Site is not located within a Historic Preservation Overlay Zone, nor was the Project Site identified in SurveyLA. Therefore, development of the 5850 Project would not result in any impacts with respect to historic resources.

The 5850 Project would be located in an urbanized area on a Site that has been previously developed. While unlikely, it is possible that unknown tribal cultural resources could exist at the Project Site and could be encountered during excavation for the four proposed subterranean parking levels. Therefore, the 5850 Project would implement Mitigation Measure CR10, which would minimize impacts in the event any tribal cultural resources are encountered during construction. Further, the City has established a standard condition of approval (provided below) to address the inadvertent discovery of tribal cultural resources. Should tribal cultural resources be inadvertently encountered, this condition of approval provides for temporarily halting of construction activities near the encounter and the 5850 Project's certified construction monitor notifying the City and Native American tribes that have informed the City that they are traditionally and culturally affiliated with the geographic area of the proposed project. If the City determines that the object or artifact appears to be a tribal cultural resource, the City would provide any affected tribe a reasonable period of time to conduct a site visit and make recommendations regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources. Therefore, the 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Condition of Approval

Inadvertent discovery of tribal cultural resources: If objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

- Upon a discovery of a potential tribal cultural resource, the project permittee shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; and (2) the Department of City Planning at (213) 978-1454.

- If the City determines, pursuant to PRC Section 21074(a)(2), that the object or artifact appears to be a tribal cultural resource, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the project permittee and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

- The project permittee shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the project permittee, reasonably concludes that the tribe's recommendations are reasonable and feasible.

- The project permittee shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any affected tribes that have been

reviewed and determined by the qualified archaeologist to be reasonable and feasible. The project permittee shall not be allowed to recommence ground disturbance activities until the City approves this plan.

- If the project permittee does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the project permittee may request mediation by a mediator agreed to by the permittee and the City who has the requisite professional qualifications and experience to mediate such a dispute. The project permittee shall pay any costs associated with the mediation.

- The project permittee may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and determined to be reasonable and appropriate.

- Copies of any subsequent prehistoric archaeological study or tribal cultural resources study or report detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the SCCIC at California State University, Fullerton.

- Notwithstanding the above, any information determined to be confidential in nature by the City Attorney's office shall be excluded from submission to the SCCIC or the public under the applicable provisions of the California Public Records Act, California PRC, and shall comply with the City's AB 52 Confidentiality Protocols.

Mitigation Measures

The 5850 Project would implement Mitigation Measure CR10 from the Certified EIR.

4.17.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the 5850 Project would be undertaken that would result in new or more severe significant impacts, and there is no new information of substantial importance that has become available relative to tribal cultural resources. No substantial changes to tribal cultural resources have occurred since certification of the EIR, and no substantial new changes in tribal cultural resources have been identified within the vicinity of the 5850 Project that would result in new or more severe significant environmental impacts.

4.17.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified related to one or more significant effects related to tribal cultural resources not discussed in the EIR,

significant effects related to tribal cultural resources previously examined that will be substantially more severe than shown in the EIR, or of mitigation measures previously determined to be infeasible which have now been determined to be feasible.

4.17.5 Mitigation Measures Addressing Impacts

As stated above, the 5850 Project would implement Mitigation Measure CR10 from the Certified EIR. Implementation of this measure would ensure that the 5850 Project's impacts with respect to tribal cultural resources are less than significant. No additional mitigation measures are required.

4.17.6 Conclusion

Based on the above, no new significant tribal cultural resources or a substantial increase in previously identified tribal cultural resources would occur as a result of the 5850 Project. Therefore, the impacts to tribal cultural resources as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.18 Utilities and Service Systems

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
UTILITIES AND SERVICE SYSTEMS: Would the project:					
(a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction of which could cause significant environment effects?	Less Than Significant	No	No	No	No
(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Less Than Significant	No	No	No	No
(c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less Than Significant	No	No	No	No
(d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less Than Significant	No	No	No	No
(e) Comply with federal, state and local management and reduction statutes and regulations related to solid waste?	Less Than Significant	No	No	No	No

4.18.1 Impact Determination in the EIR

As stated in the Certified EIR, the anticipated increase in demand for water supplies within the West Adams CPA represents less than one percent of total anticipated water supplies in the year 2030. Moreover, the impacts to water demand for future water resources are minimized because full implementation of the Community Plan in year 2030 would occur incrementally over the 20-year lifespan of the Community Plan and is continuously planned for by the City. Therefore, the Certified EIR determined that implementation of the Community Plan would result in less than significant impacts related to water supplies. With respect to water supply treatment and conveyance infrastructure, the Certified EIR concluded that the process by which drinking

water is treated is built into the delivery system, and would not need to be enhanced or expanded to meet the increased needs of the Community Plan buildout. Considering the potential delivery capacity of the Los Angeles Aqueduct alone, the potential delivery capacity of the existing water conveyance infrastructure has the capacity to meet the expected increases in demand due to implementation of the Community Plan. Therefore, the Certified EIR determined that implementation of the Community Plan would result in less than significant impacts related to water supply treatment and infrastructure.

As stated in the Certified EIR, the evaluation of the effects of the Community Plan on wastewater conveyance was made using the expected demand for wastewater conveyance as a result of the reasonably foreseeable build-out of the West Adams CPA under the implementation of the Community Plan. The Certified EIR stated that the increase in wastewater generated by the Community Plan would be 1.2 percent of the total existing average wastewater flows of the City of Los Angeles. As such the four existing treatment plants would be able to treat wastewater generated under the Community Plan. Therefore, the Certified EIR determined that implementation of the Community Plan would result in less than significant impacts related to wastewater treatment. With respect to sewer conveyance infrastructure, all development activities that require sewer connection permits are evaluated under the purview of existing capacity of sewer lines in the development site's vicinity at the time of development. By doing so, each new development must adhere to the most current Sewer Design Manual specifications and performance standards. According to the Certified EIR, the cumulative result of requiring new developments to meet rigorous design and performance standards in conjunction with a ready overflow response plan ensures that implementation of the Community Plan would result in a less than significant impact related to wastewater conveyance infrastructure.

As discussed in Section 4.9, Hydrology and Water Quality, of the Certified EIR, implementation of the Community Plan would not result in a substantial increase in impervious surfaces. Accordingly, implementation of the Community Plan would not cause a substantial increase in the peak flow rates or volumes that would exceed the drainage capacity of existing stormwater drainage facilities, and therefore does not warrant the construction of new stormwater drainage facilities or the expansion of existing facilities, and impacts with respect to stormwater drainage infrastructure would be less than significant.

The Certified EIR stated that the Community Plan is expected to comply with Section 66.32 of the LAMC during the demolition phase. Compliance with Section 66.32 of the LAMC would ensure that at least 50 percent of the demolition solid waste generated by the Community Plan would be diverted from the landfills serving the City of Los Angeles. Moreover, the Certified EIR stated that the remaining landfills have the capacity to accommodate construction of developments as a result of the Community Plan. Therefore, the Certified EIR concluded that implementation of the Community Plan would result in less than significant impacts related to solid waste.

As stated in the Certified EIR, the Community Plan would not conflict with the goals, objectives,

and policies in the Source Reduction and Recycling Element (SRRE), the City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP), the Curbside Recycling Program, or the Framework Element, which currently govern the solid waste management practices within the West Adams CPA. Additionally, the Community Plan increases the solid waste generated by 10,000 pounds per day or 1.2 percent per year over existing solid waste generation within the West Adams CPA. This level of increase does not disrupt successfully meeting the goals, objectives, and policies contained in any of the solid waste management policy documents of the City. Therefore, the Certified EIR determined that implementation of the Community Plan would result in less than significant impacts related to solid waste.

The analysis contained in the Certified EIR with respect to energy (electricity and natural gas supplies) is summarized above in Section 4.6, Energy. With respect to energy infrastructure, the Certified EIR concluded that there is no need for new facilities or major enhancements to existing facilities to accommodate the implementation of the Community Plan. Therefore, the Certified EIR determined that implementation of the Community Plan would result in less than significant impacts with respect to energy infrastructure.

Mitigation Measures

Impacts with respect to utilities and service systems were determined to be less than significant. Therefore, no mitigation measures were required.

4.18.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The 5850 Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the 5850 Project's impacts with respect to utilities were accounted for within the analysis contained in the Certified EIR.

As shown on Table 4.18-1, the 5850 Project is estimated to generate a net total of approximately 41,394 gallons per day (or 0.04 million gallons per day) of wastewater. With a remaining daily capacity of 175 mgd, the Hyperion Treatment Plan (HTP) would have adequate capacity to serve the Project's projected 0.04 mgd generation. Further, as stated above, the 5850 Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the wastewater generation for the 5850 Project was accounted for within the analysis contained in the Certified EIR. Therefore, impacts related to wastewater treatment would be less than significant, and the 5850 Project would be adequately served by the City's wastewater facilities. As part of the 5850 Project's permit process, the City would conduct further detailed gauging and evaluation to identify specific sewer connection points. If additional sewer line capacity is needed to serve the 5850 Project, the Project Applicant would be required to install adequately sized sewer lines. Thus, sewer infrastructure would be adequate to accommodate the 5850 Project. Therefore, impacts related to wastewater service would be less than significant.

Therefore, the 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Table 4.18-1
5850 Project Estimated Wastewater Generation

Land Use	Size	Rates	Total (gpd)
Office	344,947 sf	120 gallons / 1,000 sf	41,394
		Total	**41,394**

Note: sf = square feet; gpd = gallons per day
Rates: Bureau of Sanitation - Sewage Generation Factor, effective date April 6, 2012.
Table: CAJA Environmental Services, September, 2019.

The 2015 Urban Water Management Plan (UWMP) was adopted in June 2016, and projects a demand of 611,800 AFY in 2020 and 644,700 AFY in 2025.[59] The UWMP forecasts water demand by estimating baseline water consumption by use (single-family, multi-family, commercial/government, industrial), then by adjusting for projected changes in socioeconomic variables (including personal income, family size, conservation effects) and projected growth of different uses based on SCAG's 2012 RTP.[60] The 2012 RTP models local and regional population, housing supply and jobs using a model accounting for job availability by wage and sector and demographic trends (including household size, birth and death rates, migration patterns and life expectancy).[61] Neither the UWMP forecasts, nor the 2012 RTP include parcel-level zoning and land use designation as an input. The 5850 Project does not materially alter socioeconomic variables or projected growth by use. Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) is offset with Metropolitan Water District (MWD) purchases to rise to the level of demand. The UWMP demonstrates adequate capacity currently and future capacity to accommodate City growth into which the 5850 Project would easily fit, as the 5850 Project does not propose any changes to the land use or zoning designations for the Project Site. Further, the 5850 Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the water demand for the 5850 Project was also accounted for within the analysis contained in the Certified EIR.

As shown on Table 4.18-2, the 5850 Project would demand an increase of approximately 41,394 gallons of water per day (or 0.04 mgd). This total does not take any credit for any proposed sustainable and water conservation features of the 5850 Project. With the remaining capacity of approximately 50 to 150 mgd, the Los Angeles Aqueduct Filtration Plant (LAAFP) would have adequate capacity to serve the 5850 Project's projected demand for treatment of 0.04 mgd. Therefore, impacts related to water treatment would be less than significant and the 5850 Project would be adequately served by existing treatment facilities.

[59] 2015 Urban Water Management Plan, Los Angeles, pg. ES-23.
[60] 2015 Urban Water Management Plan, Los Angeles, pgs. 1-12.
[61] SCAG, 2008 Regional Transportation Plan Growth Forecast Report, pgs 2-10.

Therefore, the 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Table 4.18-2
5850 Project Estimated Water Demand

Land Use	Size	Rates	Total (gpd)
Office	344,947 sf	120 gallons / 1,000 sf	41,394
		Total	**41,394**

Note: sf = square feet; gpd = gallons per day
Wastewater generation is assumed to equal water consumption.
Rates: Bureau of Sanitation - Sewage Generation Factor, effective date April 6, 2012.
Table : CAJA Environmental Services, September 2019.

Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County are categorized as either Class III or unclassified landfills. Non-hazardous municipal solid waste is disposed in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in unclassified landfills.[62] Ten Class III landfills and one unclassified landfill with solid waste facility permits are located within Los Angeles County.[63] Of the ten Class III landfills in Los Angeles County, five Class III landfills are open to the City of Los Angeles.[64] The Class III landfills have an estimated remaining capacity of 167.58 million tons, with 149.77 million tons open to the City. The unclassified landfill serving the County is Azusa Land Reclamation with an estimated 55.71 million tons of remaining capacity.[65]

Pursuant to the requirements of Senate Bill 1374[66], the 5850 Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of nonhazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City.

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62 Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

63 The ten Class III landfills within Los Angeles County include: Antelope Valley, Burbank, Calabasas, Chiquita Canyon, Lancaster, Pebbly Beach, San Clemente, Savage Canyon, Scholl Canyon, and Sunshine Canyon City/County. The total number of Class III landfills within Los Angeles County excludes the Puente Hills Landfill, which closed on October 31, 2013. The unclassified landfill within the Los Angeles County is the Azusa Land Reclamation facility.

64 The five Class III landfills open to the City of Los Angeles include: Antelope Valley, Calabasas, Chiquita Canyon, Lancaster, and Sunshine Canyon City/County. Note that while the Calabasas Landfill is open to the City of Los Angeles, its service area is limited to the cities of Hidden Hills, Agoura Hills, Westlake Village, and Thousand Oaks per Los Angeles County Ordinance No. 91-0003.

65 County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2017 Annual Report, April 2019.

66 Senate Bill 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.

As shown in Table 4.18-3, after accounting for mandatory recycling, the 5850 Project would result in approximately 168 tons of construction waste. Given the remaining permitted capacity the Azusa Land Reclamation facility, which is approximately 55.71 million tons, as well as the remaining 149.77 million tons of capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the 5850 Project's construction solid waste disposal needs.

Table 4.18-3
5850 Project Construction Waste Generation

Building	Size	Rate	Total (tons)
Non-Residential	344,947 sf	3.89 pounds / sf	671
		Total	**671**
		Total after 75% recycling	**168**

Note: sf = square feet; 1 ton = 2,000 pounds.
Rate: U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 3, Table 4 and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.
Table: CAJA Environmental Services, September 2019.

As shown on Table 4.18-4, the 5850 Project would generate an increase of approximately 1.03 tons per day (or approximately 376 tons per year). The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with Assembly Bill 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste LA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.[67]

The increase in solid waste disposal would represent an approximate 0.01 percent increase in the City's annual solid waste disposal quantity, based on the 2017 disposal of approximately 3.2 million tons. The increase in solid waste disposal would represent approximately 0.0002 percent of the estimated remaining Class III landfill capacity of 149.77 million tons available to the City of Los Angeles.

[67] The Zero Waste LA Franchise System would divide the City into 11 zones and designate a single trash hauler for each zone. Source: LA Sanitation, "Zero Waste LA—Franchise," www.lacitysan.org/san/faces/ home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwlaf;jsessionid=nJABd_CcLHL4DCOkGSCJWv1buV9at yQtoUkP50TwYHe5jczy6OaK!782088041!NONE?_afrLoop=17071741526736871&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D17071741526736871%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dge1mehnju_4

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the construction and operation of the 5850 Project. Further, the 5850 Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the solid waste generation for the 5850 Project was accounted within the analysis contained in the Certified EIR. Therefore, impacts would be less than significant.

With respect to energy (electricity and natural gas) infrastructure, there are currently existing electricity and natural gas connections to serve the existing building located on the Project Site. The Certified EIR concluded that there is no need for new facilities or major enhancements to existing facilities to accommodate the implementation of the Community Plan. The 5850 Project proposes an office use consistent with what was analyzed in the Certified EIR for the Project Site. Therefore, the 5850 Project would not require the construction of new electricity or natural gas facilities, and impacts would be less than significant.

With regard to telecommunications, the 5850 Project would require construction of new on-site telecommunications infrastructure to serve the new building and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. Therefore, impacts with respect to telecommunications infrastructure would be less than significant.

Therefore, the 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Table 4.18-4
5850 Project Estimated Solid Waste Generation

Land Use	Size	Rates	Total (tons/day)
Office	344,947 sf	6 lbs / 1,000 sf	1.03
		Total	**1.03**

Note: sf = square feet; 1 ton = 2,000 pounds.
Rates (non-residential): City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study Table 4, July 2002.
Table: CAJA Environmental Services, September 2019.

Mitigation Measures

None required.

4.18.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

The 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.18.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to utilities impacts. No substantial changes in the environment related to recreation have occurred since certification of the EIR, and no substantial new significant resources have been identified within the vicinity of the 5850 Project that would result in new or more severe significant environmental impacts related to utilities.

4.18.5 Mitigation Measures Addressing Impacts

Because the EIR determined the Project would have a less than significant impact with respect to utilities and services systems, no mitigation measures were required. Implementation of the 5850 Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.18.6 Conclusion

Based on the above, no new significant utility and service system impacts or a substantial increase in previously identified utility impacts would occur as a result of the 5850 Project. Therefore, the impacts to utilities and service systems as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.

4.19 Wildfire

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
WILDFIRE: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
(a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	Less Than Significant	No	No	No	No
(b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Less Than Significant	No	No	No	No
(c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Less Than Significant	No	No	No	No
(d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff post-fire slope instability, or drainage change?	Less Than Significant	No	No	No	No

4.19.1 Impact Determination in the EIR

Regarding emergency response plans, the Certified EIR determined that implementation of the new Community Plan would not impair implementation of, or physically interfere with, the Los Angeles County Operational Area Emergency Response Plan, as no new streets would be introduced, nor would the overall land use patterns of the CPA be changed. Therefore, the Certified EIR concluded that implementation of the Community Plan would result in less than significant impacts related to emergency response plans.

The Certified EIR stated that the hilly central western portion of the West Adams CPA includes areas designated as Very High Fire Hazard Severity Zones. New construction in these zones must comply with a variety of requirements from the LAMC (Chapter V, Article 7, *Fire Code*), including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. Implementation of existing regulations would help minimize wildland fire

hazards. Therefore, the Certified EIR concluded that implementation of the Community Plan would result in less than significant impacts related to wildland fire.

4.19.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Project Site is not located in or near state responsibility areas, nor is the Project Site classified as a Very High Fire Hazard Severity Zone. Therefore, the 5850 Project would result in no impact related to wildfire. Therefore, the 5850 Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

4.19.3 Any New Circumstances Involving New Impacts or Substantially More Severe Impacts?

There are no substantial changes to the circumstances under which the 5850 Project would be undertaken that would result in new or more severe significant impacts, and there is no new information of substantial importance that has become available relative to wildfire. No substantial changes to wildfire have occurred since certification of the EIR, and no substantial new changes in wildfire have been identified within the vicinity of the 5850 Project that would result in new or more severe significant environmental impacts.

4.19.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified related to one or more significant effects related to wildfire not discussed in the EIR, significant effects related to wildfire previously examined that will be substantially more severe than shown in the EIR, or of mitigation measures previously determined to be infeasible which have now been determined to be feasible.

4.19.5 Mitigation Measures Addressing Impacts

Because the EIR determined the Project would have a less than significant impact on wildfire, no mitigation measures were required. Implementation of the 5850 Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.19.6 Conclusion

Based on the above, no new significant wildfire impacts or a substantial increase in previously identified wildfire impacts would occur as a result of the 5850 Project. Therefore, the impacts to wildfire as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines, Section 15162.