



CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

Sustainable Communities Environmental Assessment

8141 Van Nuys Boulevard Project (14528, 14550 W. Titus Street, 8141, 8155, 8159 N. Van Nuys Boulevard)

Case Number: ENV-2020-4228-SCEA

Related Case Number: DIR-2020-4227-CDO-SPR-HCA

Project Location: 8141, 8155, 8159 N. Van Nuys Boulevard. 14528, 14550 W. Titus Street, Los Angeles, CA, 91402

Community Plan Area: Mission Hills – Panorama City – North Hills

Council District: 6

Project Description: The Project proposes a new 7-story mixed-use building to be constructed on the southeast portion of the Project Site, including 200 residential units and approximately 2,060 square feet of ground floor commercial on the southeast corner of the Project Site (Proposed Building). The 200 units would all be market-rate and consist of 159 1-bedroom units, 39 2-bedroom units, and 2 studio units. A 3-level 504 space parking structure (Parking Building) would be constructed on the western half of the Project Site. A 10,674 square foot warehouse space (not open to the public) would be located between the Parking Building and surface parking lot along Titus Street. A 12-space surface parking lot would be constructed on the north midpoint of the Project Site accessed from Titus. The Project includes a signage program. The Project Site is currently developed with an existing vacant 14-story building that is comprised of 194 residential units and 9,533 square feet of previously permitted commercial and retail spaces (Existing Building) and a 219-space surface parking lot located at the northeast corner of Van Nuys Boulevard and Titus Street. The Existing Building will remain on-site. The Applicant requests the following discretionary actions:

- 1) Pursuant to **LAMC Section 16.05**, the Applicant requests Site Plan Review for a development project that creates 200 dwelling units.
- 2) Pursuant to **LAMC Section 13.08**, the Applicant requests a Community Design Overlay (CDO) approval with the Panorama City CDO for the proposed buildings, signage program.

Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, haul route permits, excavation permits, foundation permits, building permits, street tree removal permits, and sign permits.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

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APPLICANT:

Grand Pacific 7-28 LLC (dba
Panorama Tower)
724 South Spring Street, Suite 801,
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February 2023

Table of Contents

<u>Section</u>	<u>Page</u>
1 Introduction	1-1
2 Project Description.....	2-1
3 SCEA Findings and Consistency.....	3-1
4 Mitigation Measures from Prior EIRs	4-1
5 Environmental Impact Analysis.....	5-1
6 SCEA Conditions	6-1

<u>Figures</u>	<u>Page</u>
2-1 Regional Map.....	2-4
2-2 Aerial Map.....	2-5
2-3 Locations of Related Projects	2-21
3-1 Priority Growth Area – Job Centers	3-3
3-2 Priority Growth Area – Transit Priority Areas	3-4
3-3 Priority Growth Area – High Quality Transit Areas	3-4
3-4 Priority Growth Area – Neighborhood Mobility Areas	3-5
3-5 Priority Growth Area – Livable Corridors	3-5

Appendices

A	<u>Plans</u> , David Takacs Architecture, March 31, 2021
B	<u>Air Quality and Greenhouse Gas Emissions Technical Modeling</u> , NTEC, July 2020
C	<u>Tree Report</u> , The Tree Resource, May 21, 2020
D-1	<u>Historic Resources Report</u> , Jenna Snow Historic Preservation Consulting, May 2022
D-2	<u>Archaeological Response</u> , South Central Coastal Information Center, October 3, 2020
E	<u>Energy and Fuel Calculations</u> , CAJA Environmental Services, July 2020
F-1	<u>Geotechnical Evaluation</u> , Geotechnologies, Inc., March 26, 2020
F-2	<u>Approval Letter</u> , Los Angeles Department of Building and Safety, April 15, 2020
F-3	<u>Paleontology Resources</u> , Natural History Museum, July 16, 2020
G	<u>Phase I Environmental Site Assessment Report</u> , EFI Global, June 16, 2020
H	<u>Noise Technical Modeling</u> , NTEC, July 2020
I-1	<u>Police Response</u> , Los Angeles Police Department, September 3, 2020
I-2	<u>School Response</u> , Los Angeles Unified School District, September 15, 2020
I-3	<u>Parks and Recreation Response</u> , Los Angeles Department of Recreation and Parks, July 17, 2020
I-4	<u>Library Response</u> , Los Angeles Public Library, August 3, 2020
J-1	<u>Transportation Assessment</u> , Overland Traffic Consultants, May 2020
J-2	<u>Approval Letter</u> , Los Angeles Department of Transportation, June 30, 2020
K	<u>Sacred Lands File Search</u> , Native American Heritage Commission, July 8, 2020

- L-1** Wastewater Response, Bureau of Sanitation, July 17, 2020
- L-2** Water and Power Response, Los Angeles Department of Water and Power, October 1, 2020

1 Introduction

An application for the proposed 8141 Van Nuys Boulevard Project (Project) has been submitted to the City of Los Angeles Department of City Planning (Department of City Planning) for discretionary review. The Department of City Planning, as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA).

The State of California adopted Senate Bill 375 (SB 375), also known as “The Sustainable Communities and Climate Protection Act of 2008,” which outlines growth strategies that better integrate regional land use and transportation planning and that help meet the State of California’s greenhouse gas (GHG) emissions reduction mandates. SB 375 requires the State’s 18 metropolitan planning organizations (MPOs) to incorporate a “sustainable communities strategy” (SCS) into the regional transportation plans to achieve their respective region’s GHG emission reduction targets set by the California Air Resources Board (CARB). Correspondingly, SB 375 provides various CEQA streamlining provisions for projects that are consistent with an adopted applicable SCS and meet certain objective criteria; one such CEQA streamlining tool is the Sustainable Communities Environmental Assessment (SCEA).

The Southern California Association of Governments (SCAG) is the MPO for the County of Los Angeles (along with the Counties of Imperial, San Bernardino, Riverside, Orange, and Ventura). The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) is SCAG’s most recent RTP/SCS. The 2020-2045 RTP/SCS is a long-range visioning plan for the six-county SCAG region that highlights the existing land use and transportation conditions throughout the SCAG region and forecasts how the plan will meet the region’s transportation needs between 2020 and 2045, as well as achieve CARB’s GHG emissions reduction targets. Specifically, the 2020-2045 RTP/SCS identifies and prioritizes expenditures of anticipated funding for transportation projects of all transportation modes: highways, streets and roads, transit, rail, bicycle and pedestrian, as well as aviation ground access. It also includes a set of visions, goals, objectives, policies, and performance measures developed through public and stakeholder outreach sessions across SCAG’s region.

On September 3, 2020, SCAG’s Regional Council formally adopted the 2020-2045 RTP/SCS. On October 30, 2020, CARB officially determined that the 2020-2045 RTP/SCS would achieve CARB’s 2035 GHG emission reduction target. SB 375 allows the City, acting as lead agency, to prepare a SCEA as the environmental CEQA Clearance for “transit priority projects” (as described below) that are consistent with SCAG’s 2020-2045 RTP/SCS.

1.1 Transit Priority Project Criteria

SB 375 provides CEQA streamlining benefits to qualifying transit priority projects (TPPs). For purposes of projects in the SCAG region, a qualifying TPP is a project that meets the following four criteria (see Public Resources Code §21155 (a) and (b)):

1. Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the SCAG RTP/SCS;

2. Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
3. Provides a minimum net density of at least 20 units per acre; and
4. Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

1.2 SCEA Process And Streamlining Provisions

Qualifying TPPs that have incorporated all feasible mitigation measures and performance standards, or criteria set forth in the prior applicable EIR (e.g., 2020-2045 RTP/SCS Program EIR) and that are determined to not result in significant and unavoidable environmental impacts may be approved with a SCEA. The specific substantive and procedural requirements for the approval of a SCEA include the following:

1. An initial study shall be prepared for a SCEA to identify all significant impacts or potentially significant impacts, except for the following:
 - a. Growth-inducing impacts, and
 - b. Project-specific or cumulative impacts from cars and light trucks on global warming or the regional transportation network.¹
2. The initial study shall identify any cumulative impacts that have been adequately addressed and mitigated in a prior applicable certified EIR. Where the lead agency determines the impact has been adequately addressed and mitigated, the impact shall not be cumulatively considerable.
3. The SCEA shall contain mitigation measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study.
4. A draft of the SCEA shall be circulated for a public comment period not less than 30 days, and the lead agency shall consider all comments received prior to acting on the SCEA.
5. The SCEA may be approved by the lead agency after the lead agency's legislative body, or a planning commission if local ordinances allow for the appeal of a CEQA determination by a non-elected decisionmaker to the legislative body, conducts a public hearing, reviews comments received, and finds the following:

¹ "Regional transportation network" means all existing and proposed transportation system improvements, including the state transportation system, that were included in the transportation and air quality conformity modeling, including congestion modeling, for the final regional transportation plan adopted by the metropolitan planning organization, but shall not include local streets and roads. Nothing in the foregoing relieves any project from a requirement to comply with any conditions, exactions, or fees for the mitigation of the project's impacts on the structure, safety, or operations of the regional transportation network or local streets and roads.

- a. All potentially significant or significant effects required to be identified in the initial study have been identified and analyzed, and
 - b. With respect to each significant effect on the environment required to be identified in the initial study, either of the following apply:
 - i. Changes or alterations have been required or incorporated into the project that avoid or mitigate the significant effects to a level of insignificance.
 - ii. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
6. The lead agency's decision to review and approve a TPP with a SCEA shall be reviewed under the substantial evidence standard.

1.3 Required Findings

Based on the information contained in Section 2 (Project Description), Section 3 (SCEA Criteria and Transit Priority Project Consistency Analysis), Section 4 (Mitigation Measures from Prior EIRs), and Section 5 (Sustainable Communities Environmental Impact Analysis) of this document, the City finds that preparation of a SCEA in accordance with Public Resources Code Section 21155.2(b) is appropriate for the Project for the following reasons:

- The Project is consistent with the general use designations, density, building intensity, and applicable policies specified for the area of the Project Site in the 2020-2045 RTP/SCS prepared by SCAG, which is the MPO for the City. See Section 3 (SCEA Criteria and Transit Priority Project Consistency Analysis), page 3-1 for additional information on the Project's consistency with this finding. Van Nuys Boulevard is a livable corridor, as shown in Figure 3-6. The Project is also siting market rate housing near multiple identified RTP/SCS Job Centers.
- The State Air Resources Board, pursuant to subparagraph (H) of paragraph (2) of subdivision (b) of Section 65080 of the Government Code, has accepted SCAG's determination that the sustainable communities strategy adopted by SCAG would, if implemented, achieve the greenhouse gas emission reduction targets.
- The Project qualifies as a TPP pursuant to Public Resources Code Section 21155 in that the Project contains more than 50 percent residential use; provides a minimum net density greater than 20 units an acre; and is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan. The qualifying major transit stops include the intersection of Van Nuys Boulevard and Roscoe Boulevard, 725 feet north of the Site that provides access to Metro Lines 152 and 167.
- The Project is a residential or mixed-use project as defined by Public Resources Code Section 21159.28(d).

- The Project incorporates all relevant and applicable mitigation measures, performance standards, or criteria set forth in the prior environmental reports and adopted findings made pursuant to Public Resources Code Section 21081, including SCAG's 2020-2045 RTP/SCS Program EIR. See Section 4 (RTP/SCS Mitigation Measures) for the description of the mitigation measures imposed on the Project.
- All potentially significant or significant effects required to be identified and analyzed pursuant to CEQA in an initial study have been identified and analyzed in an initial study.
- As outlined in detail in Section 5 (Initial Study/Sustainable Communities Environmental Impact Analysis) changes or alterations have been required in or incorporated into the Project that avoid or mitigate the significant effects to a level of less than significant. The specific impact area with mitigation measures is Transportation (construction traffic and pedestrian safety).

1.4 Organization Of The SCEA

Based on the information presented above, the SCEA for the Project is organized as follows:

Section 1. Introduction: This section provides introductory information about the Project and background information regarding SB 375, lists the TPP criteria, and describes the required content of the SCEA.

Section 2. Project Description: This section provides a detailed description of the environmental setting and the Project characteristics.

Section 3. SCEA Criteria and Transit Priority Project Consistency: This section includes a discussion of the Project's consistency with the TPP criteria listed above and demonstrates that the Project satisfies all necessary criteria for approval of a SCEA as set forth in California Public Resources Code Sections 21155 and 21155.2.

Section 4. Mitigation Measures from Prior EIRs: This section identifies all of the mitigation measures contained in the Mitigation Monitoring and Reporting Program (MMRP) for SCAG's 2020-2045 RTP/SCS Program EIR and provides a discussion of the applicability of the mitigation measures to the Project.

Section 5. Sustainable Communities Environmental Impact Analysis: Each environmental issue identified in the Initial Study Checklist contains an assessment and discussion of Project-specific and cumulative impacts associated with each subject area. Where the evaluation identifies potentially significant effects, as identified on the Checklist, mitigation measures are provided to reduce such impacts to less-than-significant levels.

Section 6. SCEA Conditions: This section identifies all conditions (mitigation measures, project design features, and conditions of approval) the Project would be required to implement.

Appendices: Includes various documents, technical reports, and information used in preparation of the SCEA and can be found in the case file at the Department of City Planning.

2 Project Description

This section is based on the following item included as **Appendix A** to this SCEA:

A Plans, David Takacs Architecture, March 31, 2021

2.1 Introduction

The Project proposes a new 7-story mixed-use building to be constructed on the southeast portion of the Project Site, including 200 residential units and approximately 2,060 square feet of ground floor commercial on the southeast corner of the Project Site (Proposed Building). The 200 units would all be market-rate and consist of 159 1-bedroom units, 39 2-bedroom units, and 2 studio units. A 3-level 504 space parking structure (Parking Building) would be constructed on the western half of the Project Site. A 10,674 square foot warehouse space (not open to the public) would be located between the Parking Building and surface parking lot along Titus Street. A 12-space surface parking lot would be constructed on the north midpoint of the Project Site accessed from Titus. The Project includes a signage program.

2.2 Project Information

<u>Project Title:</u>	8141 Van Nuys Boulevard Project
<u>Case Number:</u>	ENV-2020-4228-EAF
<u>Related Case:</u>	DIR-2020-4227-CDO-SPR-HCA
<u>Project Location:</u>	8141, 8155, 8159 N. Van Nuys Boulevard. 14528, 14550 W. Titus Street, Los Angeles, CA, 91402 (Project Site)
<u>Community Plan:</u>	Mission Hills – Panorama City – North Hills
<u>Council District:</u>	6
<u>Applicant:</u>	Grand Pacific 7-28 LLC (dba Panorama Tower) 724 South Spring Street, Suite 801, Los Angeles, CA 90014
<u>Lead Agency:</u>	City of Los Angeles Department of City Planning 6262 Van Nuys Boulevard, Suite 251, Los Angeles, CA 91401
<u>Staff Contact:</u>	Kristine Jegalian, Project Planner 213-675-6769 and Kristine.jegalian@lacity.org
<u>Prepared By:</u>	CAJA Environmental Services, LLC 9410 Topanga Canyon Boulevard, Suite 101, Chatsworth, CA 91311

2.3 Environmental Setting

2.3.1 Project Site Location

The Project Site is located on the southwest corner of Van Nuys Boulevard and Titus Street, in the Mission Hills – Panorama City – North Hills Community Plan (Community Plan), in the San Fernando Valley region, in the City of Los Angeles (City), in zip code 91402, in the County of Los Angeles (County).

The Site is approximately 16 miles northwest of Downtown Los Angeles and approximately 14 miles northeast of the Pacific Ocean.

See **Figure 2-1, Regional Map**, for the location of the Project within the context of the City.

See **Figure 2-2, Aerial Map**, for an aerial view of the Site and the immediate surrounding area.

2.3.2 Surrounding Land Uses and Zoning

All nearby properties are within the Panorama City Community Design Overlay District and zoned either commercial or industrial. The area is characterized by a mixture of low-rise to mid-rise non-residential buildings, with a variety of uses, including commercial, retail, light industrial, governmental, and institutional. Surface parking is abundant, and much of it is street-facing. Building setbacks vary. Van Nuys Boulevard north of Titus Street and south of Roscoe Boulevard has a strong pedestrian orientation, with a consistent building wall. On the east side of Van Nuys Boulevard, surface parking is located behind street-facing uses.

North across Titus Street are several commercial buildings:

- 1-story commercial furniture store and surface parking lot at 8201 Van Nuys, zoned C2-2D-CDO.
- 2-story office building with general and medical office uses at 14547 Titus Street, zoned [Q]CR-2D-CDO.
- 1-story commercial building which provides awning sales at 14555 Titus Street, zoned [Q]M1-1-CDO.

South adjacent to the Site are the following buildings and uses:

- 7-story office building that has been abandoned since being damaged in the 1994 Northridge Earthquake and associated surface parking lot at 8121 Van Nuys Boulevard, zoned [Q]C2-2-CDO and [Q]M1-1-CDO.
- 2-story office building previously used for the County's Department of Social Services, at 14545 Lanark Street, zoned [Q]M1-1-CDO. The office building will be demolished and a proposed development of 180 subsidized apartments would be constructed.
- Further south across Lanark is Panorama High School, at 8015 Van Nuys Boulevards, 390

feet south of the Site.

West adjacent to the Site is a 1-story vacant office building at 14600 Titus Street, zoned [Q]M1-1-CDO

- Further southwest of the Site is Michelle Obama Elementary School (8150 Cedros Avenue), 420 feet west of the Site.

East across Van Nuys are several commercial buildings (noted from north to south):

- 1-story building at 8200 Van Nuys Boulevard, that contains the St. Jude Nursing School, 100 feet northeast of the Site.
- 1-story building at 8160 Van Nuys Boulevard that contains a Women's Health Clinic, 100 feet east of the Site.
- 1-story building at 8156 Van Nuys Boulevard that contains a church (Iglesia Ministerios El Nuevo Pacto), 100 feet east of the Site.
- 1-story building at 8146 Van Nuys Boulevard that contains a church (Pentecostales de Panorama City), 100 feet east of the Site.
- 3-story office building at 8134 Van Nuys Boulevard, 100 feet east of the Site.

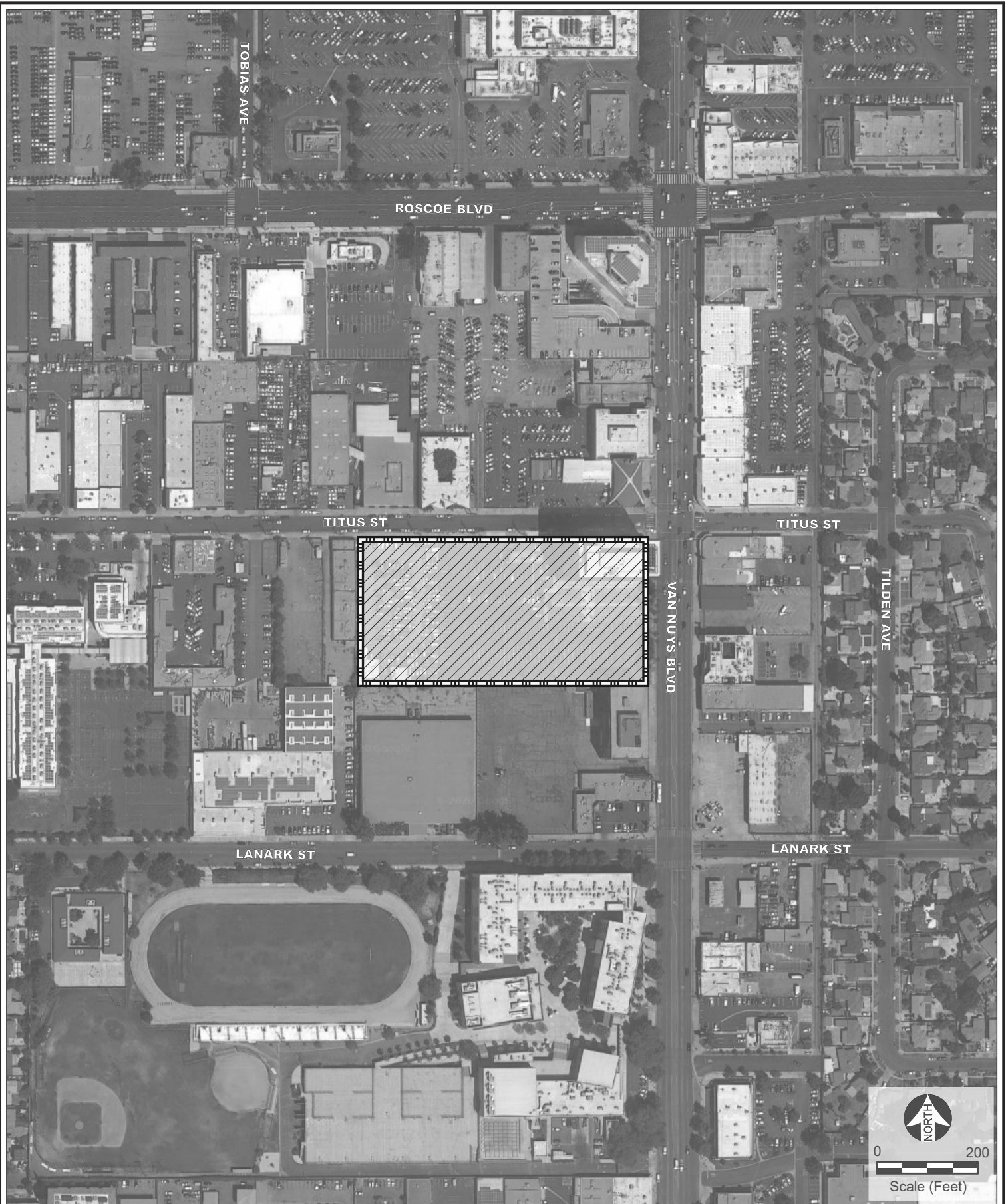


Legend

 Project Site

Source: Google Maps, 2020.

Figure 2-1
Regional Map



Legend



Project Site

Source: Google Maps 2020.

Figure 2-2
Aerial Map

2.3.3 Regional and Local Access

Regional access is provided by:

- I-405 (San Diego) Freeway, located 1.25 miles west of the Site

Local access is provided by:¹

- Titus Street (classified as Local Street Standard in Mobility Plan 2035), north of the Site
- Van Nuys Boulevard (classified as Boulevard II), east of the Site
- Roscoe Boulevard (classified as Boulevard III), one block north of the Site
- Lanark Street (classified as Collector), one block south of the Site
- Cedros Avenue (classified as Local Street Standard), one block west of the Site

2.3.4 Bicycle Facilities

Chase Street, 3 blocks northeast of the Site, has a dedicated bike lane.

The following are bicycle-friendly streets:²

- Roscoe Boulevard, north of the Site
- Van Nuys Boulevard, east of the Site
- Lanark Street, south of the Site

2.3.5 Pedestrian Facilities

There are sidewalks along the Project Site's northern boundary on Titus Street and eastern boundary on Van Nuys Boulevard.

Striped crosswalks are provided at all legs of the nearest signalized intersection (Titus Street and Van Nuys Boulevard).

2.3.6 Public Transit

The Site is within a High Quality Transit Area (HQTAs).³ HQTAs are areas within one-half mile of a high quality transit corridor, which is a corridor with fixed route bus service with service internals

1 NavigateLA, Mobility Plan 2035: <https://navigatea.lacity.org/navigatea/>, accessed August 22, 2022.

2 According to LADOT's Bike Program, Bicycle Friendly Streets (BFS) facilities parallel major corridors and provide a calmer, safer alternative for bicyclists of all ages and skill levels. BFS are multi-modal streets, which means that they accommodate all neighborhood users from cars, to bikes, to pedestrians. <https://ladotbikeblog.wordpress.com/bfs/>

3 SCAG, HQTAs 2016 based on the 2020-2045 RTP/SCS: <https://gisdata-scag.opendata.arcgis.com/datasets/high-quality-transit-areas-hqta-2016-scag-region?geometry=-121.570%2C33.364%2C-114.731%2C34.954>, accessed March 25, 2022.

no longer than 15 minutes during peak commute hours.⁴ Los Angeles County Metropolitan Transit Agency (Metro) and Los Angeles Department of Transportation (LADOT) operates public transit in the area.⁵

- Metro bus line 152 runs east-west along Roscoe Boulevard and stops at Van Nuys Boulevard, 725 feet north of the Site. The latest schedule (effective December 11, 2022) provides service every 15 minutes during the AM and PM peak periods.⁶
- Metro bus line 167 runs north-south along Van Nuys Boulevard and stops at Roscoe Boulevard, 725 feet north of the Site. The latest schedule (effective June 26, 2022) provides service every 40-45 minutes during the AM and PM peak periods.⁷
- Metro bus line 233 runs north-south along Van Nuys Boulevard and stops at Lanark Street, 250 feet south of the Site. The latest schedule (effective December 11, 2022) provides service every 10 minutes during the AM and PM peak periods.⁸
- Metro bus line 169 runs north-south along Van Nuys Boulevard and stops at Lanark Street, 250 feet south of the Site. The latest schedule (effective October 23, 2022) provides service every 60 minutes during the AM and PM peak periods.⁹
- Metro bus line 761 runs north-south along Van Nuys Boulevard and stops at Roscoe Boulevard, 725 feet north of the Site. The latest schedule (effective June 26, 2022) provides service every 15 minutes during the AM and PM peak periods.¹⁰
- LADOT DASH Panorama City/Van Nuys line runs north-south along Van Nuys Boulevard and stops at Lanark Street, 250 feet south of the Site. The latest schedule (effective July 31, 2021) provides service every 20 minutes during the AM and PM peak periods.¹¹
- Metro's proposed East San Fernando Valley project would construct a light rail transit along Van Nuys with a station at the intersection of Van Nuys Boulevard and Roscoe Boulevard. The line is proposed to open between 2028 and 2030.¹²
- Metrolink regional commuter rail Van Nuys Station, at Van Nuys Boulevard and Keswick Street, 2,650 feet south of the Site. This provides access to Los Angeles Union Station, which provides service for Metro Rail B Line (Red), D Line (Purple), and L Line (Gold).¹³

4 SCAG, Connect SoCal, Active Transportation Technical Report, page 26: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_active-transportation.pdf?1606001530, accessed August 22, 2021.

5 Metro System Map: <https://www.metro.net/riding/guide/system-maps/>, accessed August 22, 2022.

6 Metro Line 152: <https://www.metro.net/riding/schedules/?line=152-13157>

7 Metro Line 167: <https://www.metro.net/riding/schedules/?line=167-13157>

8 Metro Line 233: <https://www.metro.net/riding/schedules/?line=233-13157>

9 Metro Line 169: <https://www.metro.net/riding/schedules/?line=169-13157>

10 Metro Line 761: <https://www.metro.net/riding/schedules/?line=167-13157>

11 LADOT Line Panorama City: <https://www.ladottransit.com/dash/routes/panoramacityvannuys/panoramacityvannuys.html>

12 Metro East San Fernando Valley project: <https://www.metro.net/projects/east-sfv/>

13 In January 2020, Metro renamed its rail line, and currently has a transitional naming system using both the letter and the color: <https://www.metro.net/riding/line-letters/>

2.3.7 Planning and Zoning

Table 2-1, Project Site, lists the Site's APNs, zoning and land use designation.

Table 2-2, Lot/Parcel Areas, provides the areas by zone, before and after dedications. The Project Site lot area prior to dedication is approximately 179,975.3 square feet¹⁴ (or 4.13 acres). The existing land use designation and zoning for the Project Site is split between:

- Limited Industrial ([Q]M1-1-CDO) for the western half (99,258.3 square feet)
- Regional Commercial ([Q]C2-2CDO) for the eastern half (80,717 square feet)

Parking is permitted by right in the M zone. All parking would be provided in the M zone.

Residential is permitted by right in the C zone. All residential would be provided in the C zone.

**Table 2-1
Project Site**

Address	APN	Size (sf)	Zone	Land Use
14528, 14550 W. Titus St., 8141, 8155, 8159 N. Van Nuys Blvd.	2210-011- 029	179,975.3	[Q]C2-2-CDO [Q]M1-1-CDO	Regional Commercial Limited Industrial
Source: Zone Information & Map Access System (ZIMAS): http://zimas.lacity.org , August 2022.				

**Table 2-2
Lot/Parcel Areas**

Lot/Parcel Area	[Q]C2-2-CDO	[Q]M1-1-CDO	Total
Prior to Dedication (sf)	80,717	99,258.3	179,975.3
Dedication (sf) on Van Nuys	1,399.8	0	1,399.8
After Dedication (sf)	79,317.2	99,258.3	178,575.5
Plans, David Takacs Architecture, March 31, 2021.			

The Project Site is located within the Panorama City Community Design Overlay District (CDO). The permanent Q was installed by Ordinance No. 175,550 and apply on all zones within the boundaries of the (CDO and are listed as follows:¹⁵

- All auto-related uses shall be prohibited within the boundaries of the CDO. The definition of auto-related uses is defined in Ord. No. 175550.
- Any CDO projects involving new construction, significant façade modification or addition, or change of use shall provide a direct pedestrian pathway from the Van Nuys Boulevard right-of-way to the entrance of the business. This direct access shall not cross a driveway entrance.
- Building mounted signage shall not total more than two square feet per linear foot of building frontage and shall otherwise be subject to the Panorama City Community Design Guidelines.

¹⁴ Plans, David Takacs Architecture, March 31, 2021.

¹⁵ Q Condition: <https://planning.lacity.org/pdiscaseinfo/document/OTMxNQ0/6d0d2d25-0f15-4c7d-b0c2-0a119627b1eb/ord>

The Project Site is subject to Zoning Information (ZI):

- ZI-2452 Transit Priority Area in the City of Los Angeles
- ZI-2374 Los Angeles State Enterprise Zone
- ZI-2321 Community Design Overlay District: Panorama City
- ZI-2498 Local Emergency Temporary Regulations – Time Limits and Parking Relief

2.3.8 Existing Conditions

The Project Site is currently developed with an existing 14-story building with 194 residential units that is being leased and 9,533 square feet of previously permitted commercial and retail spaces and is currently vacant (Existing Building), on the northeast corner of the Site (Van Nuys Boulevard and Titus Street) and a 219-space surface parking lot. The Existing Building will remain on-site. As such, these units will count towards the allowable density of the C zoned portion of the Project Site.

The building was identified in SurveyLA, the City of Los Angeles' citywide historic resources survey, as appearing eligible for listing in the National Register of Historic Places (National Register), California Register of Historical Resources (California Register) as well as a local Historic Cultural Monument (HCM) as an "excellent example of Corporate International architecture; designed by significant Los Angeles architectural firm Welton Becket and Associates." Due to alterations as part of its 2016 rehabilitation, specifically replacement of the windows, the building does not appear to retain sufficient integrity for listing in the National Register, California Register, or as a local HCM.¹⁶

The western portion of the Site contains an asphalt parking lot that is used to store movie and TV prop cars and trucks.

The Site contains no street trees. There are 141 existing onsite decorative trees and palms in the parking lot and along Van Nuys Boulevard. None is a protected species.¹⁷ There are no protected trees¹⁸ or shrubs.¹⁹ Any tree removal will comply with the City's Tree Replacement Program (Urban Forestry Division, Bureau of Street Services for the street tree).

16 Historic Resources Report, Jenna Snow Historic Preservation Consulting, May 2022.

17 Tree Report, The Tree Resource, May 21, 2020.

18 LAMC Section 46.01: "PROTECTED TREE" means any of the following Southern California native tree species which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree: (a) Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus dumosa*). (b) Southern California Black Walnut (*Juglans californica* var. *californica*) (c) Western Sycamore (*Platanus racemosa*) (d) California Bay (*Umbellularia californica*) This definition shall not include any tree grown or held for sale by a licensed nursery, or trees planted or grown as a part of a tree planting program.

19 Effective February 4, 2021 in Ordinance No 186,873, the City added Mexican elderberry and toyon shrubs to the list of protected species.

2.4 Project Description

2.4.1 Project Overview

The Existing Building on the northeast portion of the Site would remain.

The proposed Project is for the construction of three new buildings and a surface parking lot, and signage program:

1. Proposed Building

A 7-story mixed-use building would be constructed on the southeast portion of the Site, including 200 residential units and approximately 2,060 square feet of ground floor commercial on the southeast corner of the Site (Proposed Building). The 200 units would all be market-rate and consist of 2 studio units, 159 1-bedroom units, and 39 2-bedroom units.

2. Parking Building

A 3-level 504 space Parking Building would be constructed on the western half of the Site.

3. Warehouse Building

A 1-story, 10,674 square foot warehouse space (not open to the public) would be located between the Parking Building and surface parking lot along Titus Street.

4. Surface Parking Lot

A 12-space surface parking lot would be constructed on the north midpoint of the Site accessed from Titus Street.

5. Signage Program

The Project includes a signage program as described below.

See **Table 2-3** for a Project Summary.

Table 2-3
Project Summary (Building Areas By Occupancy)

	Existing Building (to remain)	New Proposed Building	New Parking Building	New Warehouse Building	Total
Residential	194 units 167,922 sf	200 units 170,568 sf	-		394 units 338,490 sf
Commercial	9,533 sf	2,060 sf	-		11,593 sf
Exterior Canopy	-	-	329 sf		329 sf
Warehouse	-	-	-	10,674 sf	10,674 sf
Total	177,455 sf	172,628 sf	329 sf	10,674 sf	361,086 sf
<u>Plans</u> , David Takacs Architecture, March 31, 2021.					

2.4.1.1 Density

Per Los Angeles Municipal Code (LAMC) Section 12.22.A18(a), the C zoned portion of the site may be developed to lot area requirements (including density) of the R5 zone as the site is designated for Regional Commercial land uses by the Community Plan. The density per the R5 zone is one dwelling unit for 200 square feet of lot area.

The C2 portion of the Project Site has approximately 79,317.2 square feet of lot area after dedication of 1,399.8 square feet. The Project could provide 396 units.²⁰

The Project would provide a total of 394 units, which includes 194 units in the existing building and 200 units in the proposed building.

2.4.1.2 Floor Area

See **Table 2-4** for the floor area and floor-area-ratio (FAR).²¹

The C2 zone with Height District 2 allows for 6:1 FAR. The M1 zone with Height District 1 allows 1.5:1 FAR.

Table 2-4
Floor Area

	C Zone		M Zone		Total	
	Allowed	Provided	Allowed	Provided	Allowed	Provided
Buildable Area	79,317.2 sf		99,258 sf		178,575.5 sf	
FAR	6:1	4.4:1	1.5:1	0.1:1	3.5:1	2.02:1
Floor Area	475,903 sf	350,083 sf	148,887 sf	11,003 sf	624,790 sf	361,086 sf
<u>Plans</u> , David Takacs Architecture, March 31, 2021.						

2.4.1.3 Height

The C2 zone with Height District 2 allows for unlimited height.

The new Proposed Building would be 7 stories and 80 feet in height. The new Parking Building would be 3-levels and 40 feet in height. The new Warehouse Building would be 1-level and 27 feet 8 inches in height. These would join the existing 14-story, 177-foot tall existing building.

2.4.2 Design and Architecture

See **Appendix A** for floor plans, elevations, sections, and renderings. The Project has been designed as an integrated structure with articulation and variation created by the massing of individual components. Overall variation in building appearance is created with the use of various materials (stucco, metal), balconies, windows of different widths, the landscaped ground floor,

²⁰ 79,317.2 / 200 = 396.7

²¹ FAR expresses the relationship between the amount of useable floor area permitted in a building (or buildings) and the area of the lot on which the building stands. It is obtained by dividing the floor area of a building as defined by LAMC Section 12.03 by the buildable area of the lot.

and the transition of the first floor retail to residential upper levels. The Project has been designed to activate the pedestrian environment with retail uses, perimeter landscaping, and parking that is not visible from the street.

The design overlay and landscape plans, appealing project architecture, plus the provision of unobtrusive privacy fencing and walls, will all serve to minimize project impacts on neighboring properties. The entire project has been master-planned and comprehensively designed to substantially comply with the CDO's 26 guidelines and 73 standards. Specifically, the Project achieves the Community Design Overlay's mission to create a pedestrian-oriented, walkable district by orienting ground floor retail uses toward the street, and by building a pedestrian walkway that bisects the site between the Existing Building and Proposed Building and leads to the western half which contains the Warehouse Building and Parking Building.

2.4.3 Open Space

Table 2-5, Open Space, provides the amount of required and provided open space.

**Table 2-5
Open Space**

Use	Rate	Existing Building		Proposed Building	
		Quantity (units)	Total (sf)	Quantity (units)	Total (sf)
Required					
Studio	100 sf / unit	157	Per Certificate of Occupancy	2	200
One-bedroom	100 sf / unit	25		159	15,900
Two-bedroom	125 sf / unit	12		39	4,875
Total Required		194	19,725	200	20,975
Minimum Common Space		50%	9,863	50%	10,488
Minimum Planted Area		25%	2,466	25%	2,622
Provided					
Rear Yard		-		2,647	
Courtyard		-		3,475	
Roof Deck		0		7,853	
Private Balcony		0		7,000	
Plaza		18,475		-	
Pool		1,250			
Total Provided		19,725		20,975	
Per LAMC 12.21.G.2					
Habitable Room - An enclosed subdivision in a residential building commonly used for living purposes, but not including any lobby, hall, closet, storage space, water closet, bath, toilet, slop sink, general utility room or service porch. A recess from a room or an alcove (other than a dining area) having 50 square feet or more of floor area and so located that it could be partitioned off to form a habitable room, shall be considered a habitable room.					
For the purpose of applying the open space requirements of Section 12.21 G., a kitchen as defined herein shall not be considered a habitable room.					
A studio and 1 bedroom units have less than 3 habitable rooms. A 2 bedroom has 3 habitable rooms.					
Plans, David Takacs Architecture, March 31, 2021.					

2.4.4 Landscaping

See **Appendix A** for the location of the green space and trees.

Per LAMC Section 12.21.G.2.a.3, a minimum of 25 percent of the common open space area shall be planted with ground cover, shrubs, or trees. At least one 24-inch box tree for every four dwelling units shall be provided on site and may include street trees in the parkway.

The Project is required to provide 1 tree per 4 units. With 394 units, the Project is required to provide 99 trees. In addition, the Project is required to provide 1 tree for per 4 surface parking spaces. With 12 surface spaces, this would be 3 trees.

The Project would meet this requirement by providing 113 trees.

The Project Site will be landscaped in accordance with the submitted landscape plan and the Zoning Code's Landscape Ordinance. Plantings will visually connect and integrate all four buildings (Existing Building, Proposed Building, Parking Building, Warehouse Building). The landscaping will continue around the outdoor pool and deck and an inner courtyard. The courtyard will be planted, and include seating.

2.4.5 Access and Circulation

The Site contains one existing curb cut on Van Nuys Boulevard and two curb cuts on Titus Street.

The Van Nuys Boulevard curb cut would be removed. The two Titus Street curb cuts would accommodate the Parking Building and surface parking lot.

Internal circulation would provide access to each parking level in the Parking Building. The parking lot would be accessed separately.

Pedestrian access to the commercial would be located in the front of the building on Van Nuys Boulevard. Access to the residential lobby would be on the north side of the proposed building along a pathway that would link to the existing building.

2.4.6 Trash/Recycling Collection, Rooftop Equipment, and Loading Areas

The Project is designed to minimize the visual impact of trash receptacles and loading areas. Trash/recycling, utilities, storage, and loading spaces would be located within the podium and enclosed and/or screened and would not be visible from off-site locations.

Rooftop equipment, such as heating, cooling, and air conditioning (HVAC) units, would be set back from the roof parapet edge and appropriately screened from public view.

2.4.7 Vehicle Parking

Table 2-6, Vehicle Parking, provides the amount of required and provided vehicle parking.

Pursuant to LAMC Section 12.21 A.4(i), commercial parking would be provided consistent with the State Enterprise Zone parking requirements, which allow one space to be provided for every 500 square feet of commercial floor area proposed.

**Table 2-6
Vehicle Parking**

Use	Rate (spaces)	Existing Building			Proposed Building		
		Quantity	Required	Provided	Quantity	Required	Provided
Residential							
Studio	1 / unit	157	157		2	2	
One-bedroom	1.5 / unit	25	38		159	239	
Two-bedroom	2 / unit	12	24		39	78	
Three-bedroom	2 / unit	0	0		0	0	
Subtotal			219			319	
Bike Reduction (15%)			(32)			(47)	
Subtotal			187	187		272	272
Non-residential							
Commercial	2 / 1,000 sf	9,533*	32	32	2,060	4	4
Warehouse	1 / 500 sf	-	-	-	10,000	20	20
	1 / 5,000 sf	-	-	-	674	1	1
Subtotal			32	32		25	25
Total			219	219		297	297
*The Existing Building was originally approved for a larger commercial area that required 32 parking spaces. The commercial areas has been reduced but the parking required/provided remains unchanged. Plans, David Takacs Architecture, March 31, 2021.							

According to LAMC Section 99.04.106.4.2, where multi-family dwelling units and other "R" occupancies are constructed on a building site, and parking is available, 30% of the total number of parking spaces provided, but in no case less than one space, shall be electric vehicle charging spaces (EV spaces) capable of supporting future electric vehicle supply equipment (EVSE). According to LAMC Section 99.04.106.4.4, the number of electric vehicle charging stations (EVCS) shall be 10% of the total number of parking spaces provided for all new multi-family dwelling units, other "R" occupancies, hotels and motels.

Calculations for the required number of EV spaces and electric vehicle charging stations (EVCS) shall be rounded up to the nearest whole number. The number of EVCS can be counted towards the total number of EV spaces required for the building required per Subsections 99.04.106.4.2 and 99.04.106.4.3.1.

LAMC Section 99.05.106.5.3.3 applies to nonresidential uses and has the same 30% EVSE requirements.

LAMC Section 99.05.106.5.3.6 applies to nonresidential uses and has the same 10% EVCS requirements.

The Project would provide 90 EVSE spaces (297 x 0.3), of which 30 would have EVCS (297 x .1).

2.4.8 Bicycle Parking

Table 2-7, Bicycle Parking, provides the amount of required and provided bicycle parking. Short-term bicycle parking shall consist of bicycle racks that support the bicycle frame at two points. Long-term bicycle parking shall be secured from the general public and enclosed on all sides and protect bicycles from inclement weather.

Per LAMC Section 12.21.A.16.c, buildings undergoing a change of use shall not be required to provide bicycle parking. Thus, the Existing Building was not required to provide bicycle parking. However, per the Certificate of Occupancy, the Existing Building includes 27 short-term parking and 202 long-term parking, for a total of 219 spaces.

The Proposed Building would provide 17 short-term and 192 long-term parking, for a total of 209 spaces.

**Table 2-7
Bicycle Parking**

Use	Rate (spaces)	Existing Building			Proposed Building		
		Quantity	Required	Provided	Quantity	Required	Provided
Long-Term Spaces							
Residential	1 / unit	1-25	25		1-25	25	
	1 / 1.5 units	26-100	50		26-100	50	
	1 / 2 units	101-200	47		101-200	50	
Subtotal			122	194*		125	125
Additional Bicycle Spaces for Parking Reduction (47 x 4)							188
Commercial	1 / 2,000 sf	9,533	6		2,060	2	
Warehouse	1 / 10,000 sf	-	-		10,674	2	
Subtotal			6	8*		4	4
Total			128	202*		129	192
Short-Term Spaces							
Residential	1 / 10 units	1-25	2.5		1-25	2.5	
	1 / 15 units	26-100	5		26-100	5	
	1 / 20 units	101-200	4.7		101-200	5	
Subtotal			13	19*		13	13
Commercial	1 / 2,000 sf	9,533	6		2,060	2	
Warehouse	1 / 10,000 sf	-	-		10,674	2	
Subtotal			6	8*		4	4
Total			19	27*		17	17
*Numbers for Existing Building from the Certificate of Occupancy. The Existing Building was originally approved for a larger commercial area that required 6 bicycle parking spaces. The commercial areas has been reduced but the parking required/provided remains unchanged. LAMC Table 12.21 A.16 (a)(1)(i) and Ordinance No. 185,480. A minimum of two short-term bicycle parking spaces shall be provided in all cases. Per LAMC Section 12.21.A.16(b): When the application of these regulations results in the requirement of a fractional bicycle space, any fraction up to and included on-half may be disregarded, and any fraction over one-half shall be construed as requiring one bicycle parking space. Plans, David Takacs Architecture, March 31, 2021.							

2.4.9 Lighting

Exterior lighting would be shielded to reduce glare and eliminate light being cast into the night sky. Security lighting would be integrated into the overall architecture and landscaping.

The Project would also comply with LAMC lighting regulations that include approval of street lighting plans by the Bureau of Street Lighting; limited light intensity from signage to no more than three foot-candles above ambient lighting; and limited exterior lighting to no more than two foot-candles of lighting intensity or direct glare onto specified sensitive uses, under the terms of the LAMC Section 93.0117(b).

The Project would comply with the CDO Design Guidelines and Standards regarding storefront lighting (Guideline 13), driveway and walkway lighting (Guideline 14), and signs (Guideline 20).

For the Parking Building, the lighting plan includes linear wash lighting that emphasizes the underside serpentine stair, up-lighting at the columns of the Parking Building. The lighting features incorporated into these two plans complement the lighting features of the Existing Building, which are up-lighting at the top of the building that illuminates the architectural roof frame. In addition, walkways will have path lights and trees will have up lighting.

The retail spaces in the Proposed Building incorporate direct storefront lighting. This lighting, which consists of Gooseneck sconces with downlighting, illuminates the façade of both retail spaces and also the adjacent sidewalk.

The Project's lighting program provides exterior lighting for safety and security. Lighting is provided throughout, including the open space, pool, and deck areas; the surface parking lot; the new accessory bathroom building; the pedestrian walkway; and the exterior surfaces of all three main buildings. The number, spacing, and design features of all lighting elements and fixtures ensures there will be no excessive levels of light or glare emanating from this master-planned unified development.

2.4.10 Signage

The Project's signage program is provided as part of **Appendix A** and summarized in **Table 2-8**. There would be a total of 42 signs.

Table 2-8
Project Signage

Location	Orientation	Wall Linear Feet	Max Allowable (sf)	Total Proposed (sf)	Total Proposed Quantity
Parking Building	North - Titus	196	392	138	3
Warehouse Building	North - Titus	60	120	111	2
Surface Parking	North - Titus	N/A	N/A	40	1
	North - Titus	170	340	251	8

Existing Building	Northeast – Titus and Van Nuys				
	Northeast – Titus and Van Nuys	81	162	143	5
	East – Van Nuys				
	South - Plaza	170	340	187	7
	West – in property	81	162	34	6
Proposed Building	East – Van Nuys	122	244	75	7
	North – Plaza	245	490	19	3
Plans, David Takacs Architecture, March 31, 2021.					

Project Site signage would include building identification, wayfinding, and security markings. Signage would be similar to other signage in the Project vicinity and no off-site signage is proposed.

The signage proposed substantially complies with CDO Standard 20A. The ground floor of the Existing Building includes 9,533 square feet of previously permitted commercial and retail spaces and is currently vacant. The layout of this space is being reconfigured for one “Food-Hall” with 16 “Kitchens”. Each kitchen will serve a different type of food operated by one vendor independently; as such, requiring 16 different commercial wall signs (one for each tenant). These 16 commercial signs are being designed to be installed on three building-faces (7 on the north-face, 6 on the south face, and 3 on the east face) of the ground floor of the existing tower. These are noted as part of the overall signs allocated to the Existing Building in **Table 2-8**.

The Proposed Building will include two retail spaces and will have one commercial wall sign for each tenant.

The Warehouse Building requests one commercial sign.

Various tenants will be occupying various non-residential spaces on the Site and will need sign to identify their businesses to the general public and patrons of this unified development. The comprehensive Signage Program, included as a part of the entitlement package, fully complies with the sign requirements and regulation of this CDO.

The residential and auxiliary signs are for identifications and directional purposes and are necessary for providing safety and convenience of the residents and patrons of the development.

All of the signs for the site will consist of channel signs, mounted separately, and will comply with the requirements of CDO Standard 20D - as each commercial tenant is selected. Signs will not include any blinking, flashing, or running lights, etc.

2.4.11 Site Security

The Project would incorporate security measures for the safety of its residents and visitors. During construction of the Project, the construction areas would be fenced and gated. Security features to assist in crime prevention efforts and to reduce the demand for police protection services would include secured building access/design to residential areas; lighting of building entryways and

plaza areas; staff training in safety and sound security policies; and possible video surveillance. The security program would include controlling access; monitoring entrances and exits of buildings; monitoring fire/life/safety systems.

Security fencing around the site will be open steel in order to provide visibility into the landscaped areas and the gates will stay opened during the business hours.

2.4.12 Sustainability Features

The Project would comply with the applicable Los Angeles Green Building Code (LAGBC, effective January 1, 2023)²² and the applicable California Green Building Standards Code (CalGreen, 2022 version effective January 1, 2023).²³ The applicability is determined when the Project is submitted and accepted by plan check.

Further considerations regarding energy efficiency and sustainability include native plants and drip/subsurface irrigation systems, individual metering or sub metering for water use, leak detection systems, and provisions for electric vehicle charging.

All building systems would meet current Title 24 Energy Standards, and the proposed building would be designed to promote better day lighting and air ventilation. These standards would reduce energy, water usage, and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but not be limited to, WaterSense-labeled plumbing fixtures and Energy Star-labeled appliances, reduction of indoor and outdoor water use, weather-based controller and drip irrigation systems, and water-efficient landscape design. In addition, the landscaping would serve to help reduce solar heat gain and facilitate stormwater generation on-site. Furthermore, the Project would recycle and reuse building and construction materials to the maximum extent feasible.

The Project would emphasize energy and water conservation, which would be achieved through the use of energy-efficient heating, ventilation, and air conditioning (HVAC) and lighting systems, and ENERGY STAR appliances, and low-flow plumbing fixtures.

The Project would include pre-wiring for electric vehicle (EVSE) charging spaces and installed chargers for immediate use by EVCS, as required by the LAMC.

The Project's infill location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities. The Project's proximity to public transportation would reduce vehicle miles traveled for residents and visitors.

2.4.13 Anticipated Construction Schedule

The estimated construction duration is shown in **Table 2-9, Construction Duration**. The

22 City of Los Angeles Department of Building and Safety, Green Building: <http://ladbs.org/forms-publications/forms/green-building>, accessed on August 22, 2022.

23 California Building Codes: <https://www.dgs.ca.gov/BSC/Codes>, accessed on August 22, 2022.

estimated operational year is 2024.²⁴ In practice, construction could begin at a later time. However, using an earlier start date represents a worst-case scenario for the analysis of construction emissions, because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

Demolition would remove the current paved parking asphalt, first for the Parking Building and then for the Proposed Building.

No import and 220 cubic yards export of soil will be exported since the Proposed Building and Parking Building would be at grade. Minimal export/grading is needed for support footings and utilities. Export would be deposited at Irwindale Dump Site in Azusa, approximately 40 miles from the Site (one-way).

The Parking Building (and Warehouse space within it) would be constructed first to provide the necessary parking for the Existing Building. Then the Proposed Building would be constructed.

Truck routes are expected to utilize the most convenient access to freeway ramps. The truck routes would comply with the approved truck routes designated within the City and/or adjacent jurisdictions. Trucks traveling to and from the Project Site must travel along the designated routes.

**Table 2-9
Construction Duration**

Phase	Parking and Warehouse Buildings	Residential Building
	Duration	Duration
Demolition	5 days	5 days
Grading	2 days	2 days
Construction	8 months	1.5 years
Architectural Coatings	2 weeks	2 months
<u>Demolition</u> involves removing buildings or structures. <u>Grading</u> involves the cut and fill of land to ensure that the proper base and slope is created for the foundation. <u>Construction</u> involves the construction of the foundation, structures and buildings.) <u>Architectural Coating</u> involves the application of coatings to both the interior and exterior of buildings or structures, the painting of parking lot or parking garage striping, associated signage and curbs, and the painting of the walls or other components such as stair railings inside parking structures. Construction schedule, including start, end, and duration dates are estimates only. Some overlap of phasing may occur. CAJA Environmental Services, July 2020.		

2.4.14 Discretionary Requests

Discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:²⁵

- 1) Pursuant to **LAMC Section 16.05**, the Applicant requests Site Plan Review for a development

²⁴ Transportation Assessment, Overland Traffic Consultants, May 2020.

²⁵ Department of City Planning Application Form.

project that creates 200 dwelling units.

- 2) Pursuant to **LAMC Section 13.08**, the Applicant requests a Community Design Overlay (CDO) approval with the Panorama City CDO for the proposed buildings and signage program, and pool area and restroom.

Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, haul route permit, excavation permits, foundation permits, building permits, and sign permits.

2.5 Related Projects

In this SCEA, cumulative impact analyses are provided for each environmental issue discussed in Section 5 (Sustainable Communities Environmental Impact Assessment) and can be found in each respective subsection of Section 5.²⁶

Table 2-10 lists 24 reasonably foreseeable related projects within a 0.5-mile radius of the Project Site that were considered in the cumulative impact analyses. The list of Related Projects is based on information provided by Department of City Planning and Los Angeles Department of Transportation (LADOT), as well as on recent studies of development projects in the Project Site area. The location of the Related Projects is included as **Figure 2-3** below.

The Related Projects include the following uses:

- 2,079 residential units (including apartments, condominiums, and senior uses)
- 575,132 square feet of retail and commercial space
- 100 hotel rooms
- 500 student school

The nearest Related Projects (within 1,000 feet of the Site) are:

- No. 20, 8401 Van Nuys Boulevard, 975 feet north of the Site
- No. 21, 14626 Roscoe Boulevard, 640 feet northwest of the Site
- No. 22, 14665 Roscoe Boulevard, 990 feet northwest of the Site
- No. 24, 14545 Lanark Avenue, 10 feet south of the Site

²⁶ Pursuant to Public Resources Code Section 21155.2(b)(1), the SCEA is required to identify all significant or potentially significant impacts of a TPP through the preparation of an initial study, other than growth inducing impacts or specific or cumulative impacts from cards and light-duty trucks trips consistent with Section 21159.28, based on substantial evidence in light of the whole record. The Initial Study Checklist for the Project is attached hereto in Section 4 of this SCEA. Additionally, the SCEA is required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified EIRs.

Figure 2-3
Locations of Related Projects

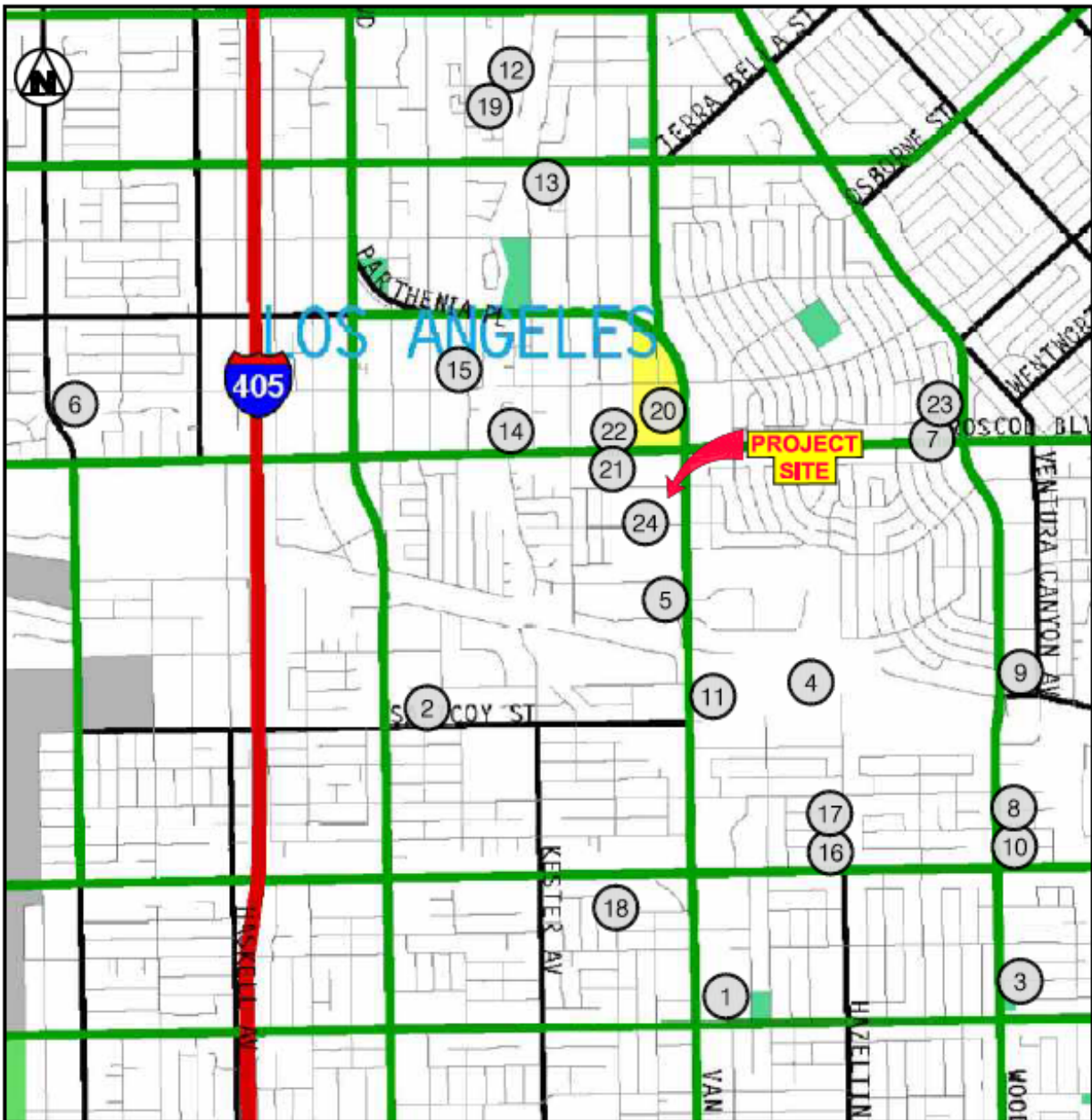


**Table 2-10
Related Projects List**

No.	Land Use/Description	Size (sf)	Units	Address
1	Apartment Retail	13,000	100	6828 Van Nuys Boulevard
2	Condominium		85	15141 Saticoy Street
3	Apartment		16	6844 Woodman Avenue
4	Industrial	283,920		7600 Tyrone Street
5	Mixed-Use	46,200		7869 Van Nuys Boulevard
6	Single Family		74	16110 Chase Street
7	Retail	4,230		13755 Roscoe Boulevard
8	Apartment		86	7346 Woodman Avenue
9	Senior Apartment		93	7700 Woodman Avenue
10	Apartment		93	13641 Sherman Way
11	Apartment		124	7644 Van Nuys Boulevard
12	School Apartment	500 students	160	9356 Lemona Avenue
13	Single Family		58	14834 Nordhoff Street
14	Apartment		22	14915 Roscoe Boulevard
15	Single-Family		10	8621 Noble Avenue
16	Single-Family		132	14110 Chapparel Lane
17	Single-Family		29	7355 Hazeltine Avenue
18	Apartment		70	14645 Gault Street
19	Single Family		24	9231 Lemona Avenue
20	Panorama Mall Hotel Theater	132,000 100 rooms 2,000 seats		8401 Van Nuys Boulevard
21	Supermarket Restaurant	18,600 1,900		14626 Roscoe Boulevard
22	Apartment Health Club Shopping Center	18,000 42,000	623	14665 Roscoe Boulevard
23	Apartment Retail	14,982	100	8323 Woodman Avenue
24	Apartment Retail	300	180	14545 Lanark Street
sf = square feet				
Source: <u>Transportation Assessment</u> , Overland Traffic Consultants, May 2020.				

3 SCEA Findings And Consistency

3.1 Consistency With Transit Priority Project Criteria

As discussed in Section 1 (Introduction), a Sustainable Communities Environmental Assessment (SCEA) may be prepared for a project that (a) is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in a sustainable communities strategy (see California Public Resources Code Section 21155(a) and (b) is a “transit priority project” (as defined in California Public Resources Code Section 21155(b)). As further described below, the Project meets these criteria and thus, is eligible for certain CEQA streamlining benefits by way of preparing a SCEA for purposes of clearance under the California Environmental Quality Act (CEQA). Specifically, Section 21155(b) applies to a project that meets the following criteria:

1. Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, for which the California Air Resources Board (CARB) has accepted a metropolitan planning organization’s determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets established by CARB;
2. Is a Transit Priority Project in that the project meets the following criteria:
 - a. Contains at least 50 percent residential use, based on total building square footage and if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
 - b. Provides a minimum net density of at least 20 units per acre; and
 - c. Is located within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan/sustainable communities strategy (RTP/SCS).

Consistency with Criterion #1 – The Project is consistent with the general use designation, density, and building intensity and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy.

The Southern California Association of Government’s (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) includes strategies for accommodating projected population, household, and employment growth in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related greenhouse (GHG) emissions reductions through increasing transportation choices aimed at triggering reduced dependence on automobiles and increased growth in walkable, mixed-use communities and High Quality Transit Areas (HQTAs), and by encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting the implementation of

sustainability policies, and promoting a green region. As a land use tool, the 2020-2045 RTP/SCS identifies Priority Growth Areas (PGAs) throughout the SCAG region where these land use strategies can be fully realized. These PGAs include Job Centers, Transit Priority Areas, High Quality Transit Areas, Neighborhood Mobility Areas, Livable Corridors, and Spheres of Influence. These PGAs account for only four percent of the region's total land area, but implementation of SCAG's growth strategies will help these areas accommodate an estimated 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2020 and 2045. This more compact form of regional development, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces, and conserve the region's resource areas.

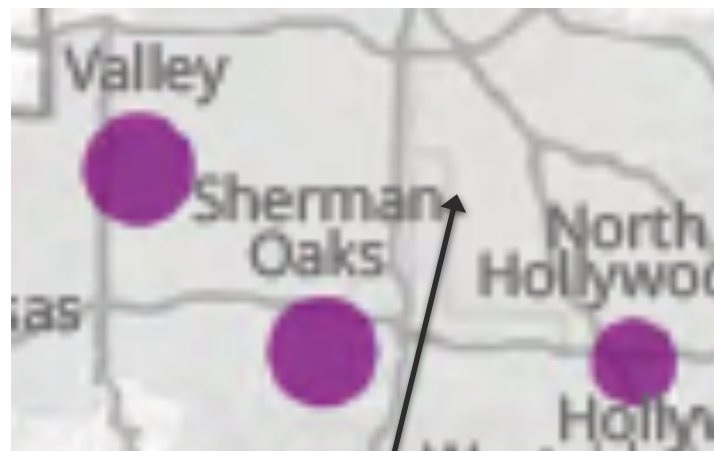
The 2020-2045 RTP/SCS identifies these PGAs on Exhibits 3.6 through 3.10, which are included in this SCEA as **Figures 3-1** through **3-5**. As shown in the figures, the Project Site is located near a Job Center; within the boundaries of a TPA, an HQTAs, a Neighborhood Mobility Area; and along a Livable Corridor. Accordingly, the Project would be consistent with the general use designation, density, and building intensity set forth in the 2020-2045 RTP/SCS for each of these types of PGA.

- **Job Centers:** Areas with denser employment than their surroundings. The Project would be located near several Job Centers including those located in the Valley (Northridge), Sherman Oaks, and North Hollywood areas. The 2020-2045 RTP/SCS prioritizes employment growth and residential growth in existing Job Centers in order to leverage existing density and infrastructure. When growth is concentrated in Job Centers, the length of vehicle trips for residents can be reduced.
- **Transit Priority Areas (TPAs):** Areas within one-half mile of a major transit stop that is existing or planned. According to the 2020-2045 RTP/SCS, focusing regional growth in areas with planned or existing transit stops is key to achieving equity, economic, and environmental goals. Infill within TPAs can reinforce the assets of existing communities, efficiently leveraging existing infrastructure and potentially lessening impacts on natural and working lands. Growth within TPAs supports the 2020-2045 RTP/SCS's strategies for preserving natural lands and farmlands and alleviates development pressure in sensitive resource areas by promoting compact, focused infill development in established communities with access to high-quality transportation. The Project is in close proximity (within ½ mile) of a Major Transit Stop: Roscoe Boulevard and Van Nuys Boulevard, which is served by Metro Lines 152, 167, 169, 233, and 761 and LADOT DASH Panorama City/Van Nuys.
- **High Quality Transit Areas (HQTAs):** Areas within one-half mile from major transit stops and high quality transit corridors. Like TPAs, HQTAs are places where vibrant TOD can be realized and are a cornerstone of land use planning best practice in the SCAG region. Infrastructure investments that support walkable, compact communities that integrate land use and transportation planning for a better functioning built environment are essential within HQTAs. New developments should be context-sensitive, responding to the existing physical conditions of the surrounding area. Sensitively designed TODs can preserve existing development patterns and neighborhood character while providing a balance of housing choices. The Site qualifies as within a HQTAs because Metro bus lines 152, 233, and 761 are the qualifying rail

service or bus service where lines have peak headways of less than 15 minutes, as demonstrated in their schedules described in Section 2 (Project Description).

- **Neighborhood Mobility Areas (NMAs):** These areas focus on creating, improving, restoring and enhancing safe and convenient connections to schools, shopping, services, places of worship, parks, greenways and other destinations. NMAs have robust residential to non-residential land use connections, high roadway intersection densities and low-to-moderate traffic speeds. NMAs can encourage safer, multimodal, short trips in existing and planned neighborhoods and reduce reliance on single occupancy vehicles. NMAs support the principles of center focused placemaking. Fundamental to neighborhood scale mobility in urban, suburban and rural settings is encouraging “walkability,” active transportation and short, shared vehicular trips on a connected network through increased density, mixed land uses, neighborhood design, enhanced destination accessibility and reduced distance to transit. Targeting future growth in these areas has inherent benefits to Southern California residents – providing access to “walkable” and destination-rich neighborhoods to more people in the future.
- **Livable Corridors:** Livable Corridor land-use strategies include development of mixed use retail centers at key nodes along corridors, increasing neighborhood-oriented retail at more intersections, applying a “Complete Streets” approach to roadway improvements and zoning that allows for the replacement of underperforming auto- oriented strip retail between nodes with higher density residential and employment. Livable Corridors also encourage increased density at nodes along key corridors, and redevelopment of single-story, under-performing retail with well-designed, higher density housing and employment centers.

Figure 3-1 Priority Growth Area - Job Centers



Project Site

SCAG Region Proposed 2020 RTP/SCS Job Centers (Total Employment)

- Less than 10,001 (17)
- 10,001 - 25,000 (22)
- 25,001 - 50,000 (19)
- 50,001 - 150,000 (11)
- More than 150,000 (3)

Figure 3-2 Priority Growth Area – Transit Priority Areas

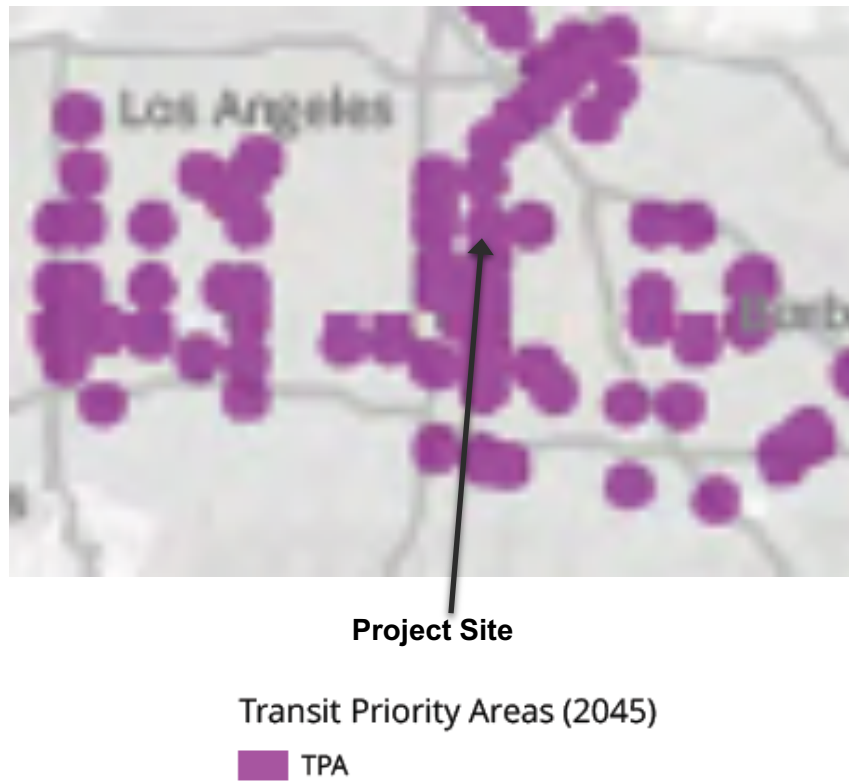


Figure 3-3 Priority Growth Area – High Quality Transit Areas

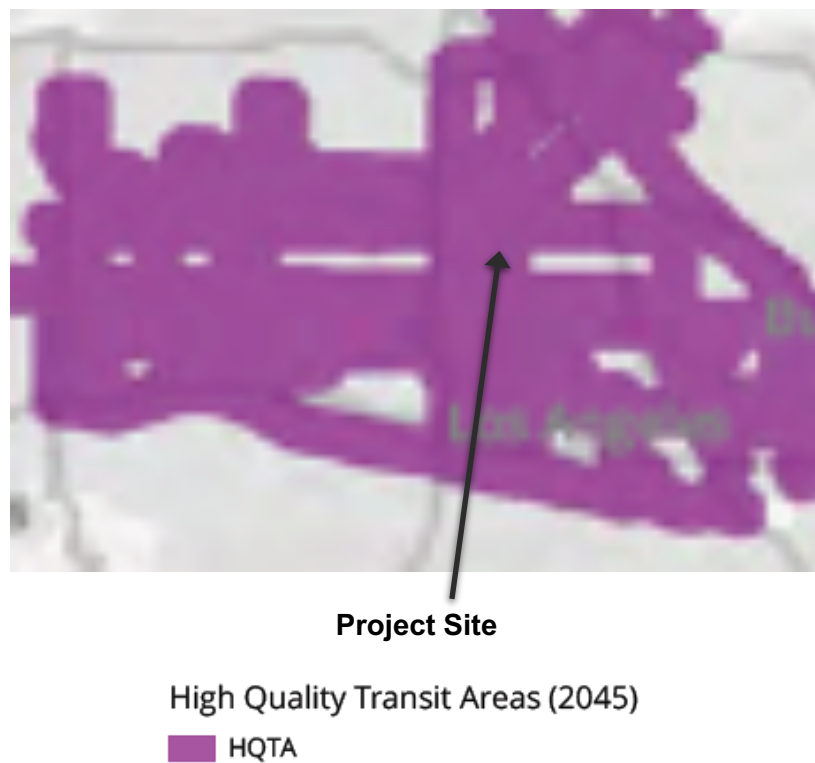


Figure 3-4 Priority Growth Area – Neighborhood Mobility Areas

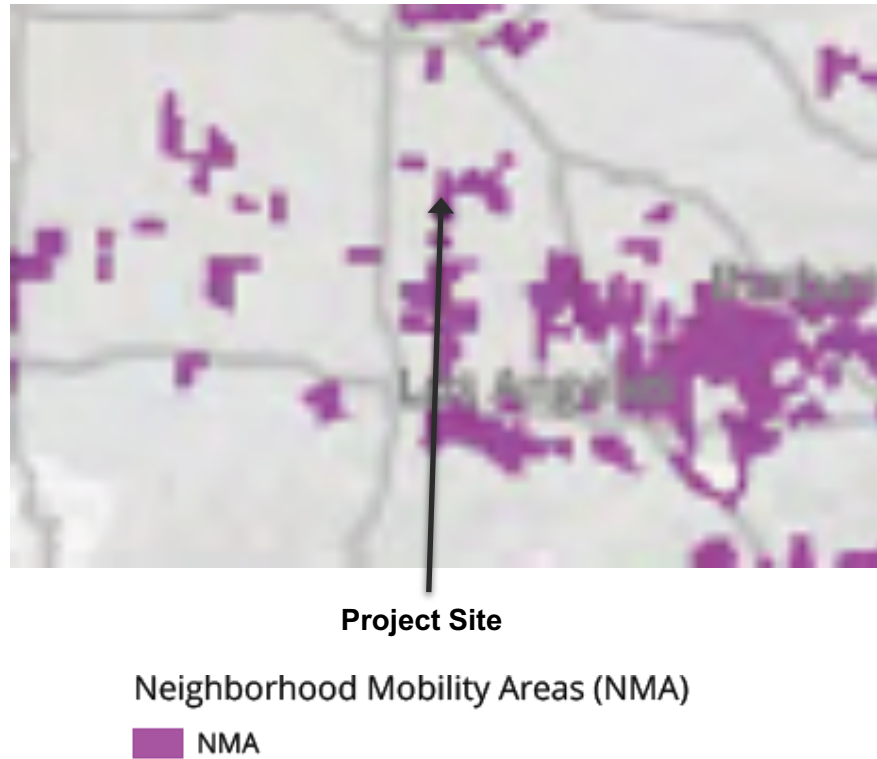
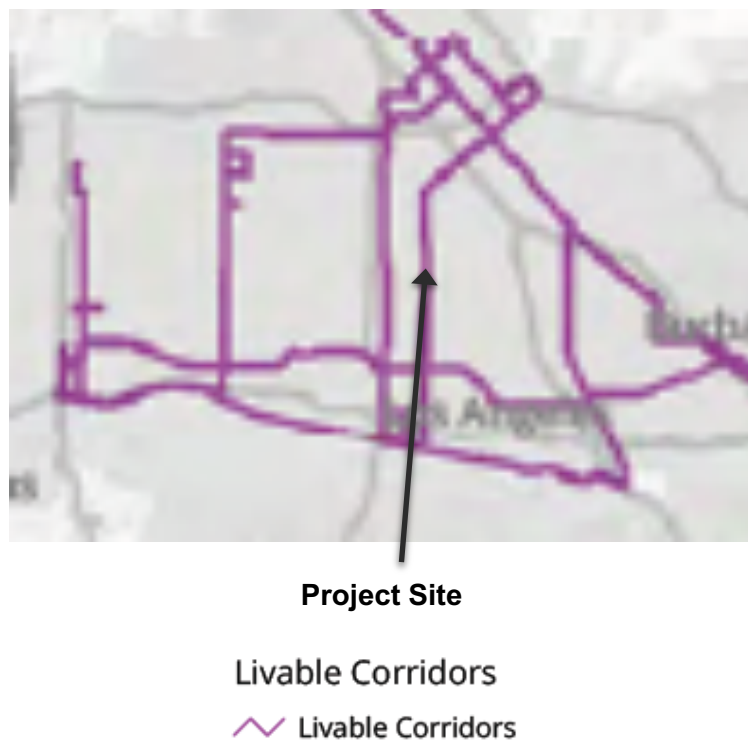


Figure 3-5 Priority Growth Area – Livable Corridors



The Project would construct housing and neighborhood-serving commercial uses on an infill site near transit and sources of employment, shopping, entertainment, and housing. The Project Site is located within specifically designated areas identified in the 2020-2045 RTP/SCS as PGAs, and the Project would significantly increase the housing supply in the Project Site area. The Project would also increase housing diversity in the PGA in which the Project Site is located.

Given the urban nature of the Project Site area, Project residents and employees would be able to walk and bike to work and to shop. In addition, the Project Site's location near robust transit opportunities (including multiple bus lines with high frequency service along Roscoe Boulevard and Van Nuys Boulevard and the future Metro East San Fernando Valley transit line) would further reduce dependence on automobile travel, reducing the need to own an automobile and pay for parking.

Project residents and guests would have access to a residential lobby located at ground level that would provide connectivity to the pedestrian infrastructure adjacent to and in the vicinity of the Project Site. The provision of the ground-floor commercial use would further activate the pedestrian environment of the neighborhood.

The Proposed Building would provide 17 short-term and 192 long-term parking, for a total of 209 spaces. This would encourage bicycling as a form of exercise and transportation. This type of transit-oriented mixed-use project helps to reduce both dependence on automobile travel and mobile-source GHG emissions. Thus, the Project is consistent with SCAG's land use strategies related to reducing GHG emissions by encouraging growth near destinations and mobility options. As such, the Project would be consistent with the 2020-2045 RTP/SCS's goals, policies and benefits for land use, density, and intensity of development.

Further, as discussed in **Table 3-1** and **3-2**, the Project would be substantially consistent with the applicable goals and guiding principles and strategies (respectively) of SCAG's 2020-2045 RTP/SCS.

Table 3-1
Consistency with 2020-2045 RTP/SCS: Goals and Guiding Principles

Goals and Policies	Project Consistency Assessment
Goal 1 Encourage regional economic prosperity and global competitiveness.	Not Applicable. This goal is directed towards SCAG and the City and does not apply to the Project. However, the Project would construct housing and neighborhood-serving commercial uses near other commercial, office, and cultural uses in an existing urban area, supporting the regional economic prosperity and global competitiveness of Southern California by providing housing and supportive commercial uses. The Project is also siting market rate and affordable housing near multiple identified RTP/SCS Job Centers.
Goal 2 Improve mobility, accessibility, reliability, and travel safety for people and goods.	Consistent. The Project Site is located in a highly urbanized area of the City and would develop 200 multi-family residential units and approximately 2,060 square feet of commercial land uses within an HQTa and along

Table 3-1
Consistency with 2020-2045 RTP/SCS: Goals and Guiding Principles

Goals and Policies	Project Consistency Assessment
	a Livable Corridor near multiple Job Centers, as defined by SCAG, and within a TPA as defined by SB 743, and also in close proximity to existing and proposed residences and commercial opportunities. Also, the Project would ensure safe travel at and near the Project Site by improving the public sidewalks adjacent to Project Site and ensuring safe vehicular and pedestrian access. In addition, the Project would include lighting of pedestrian pathways adjacent to the Project Site to allow for safe travel. Furthermore, the Project would be subject to the Site Plan Review requirements of the City and would be required to coordinate with the Department of Building and Safety and the Los Angeles Fire Department to ensure that all access points, driveways, and parking areas would not create a design hazard to local roadways. Therefore, the Project would allow for mobility, accessibility, reliability, and travel safety for people and goods.
Goal 3 Enhance the preservation, security, and resilience of the regional transportation system.	Not Applicable. This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system.
Goal 4 Increase person and goods movement and travel choices within the transportation system.	Consistent. The Project would construct market rate and affordable housing and commercial uses near other commercial, office, and cultural uses and multiple identified Job Centers. Therefore, Project residents and employees would be able to walk and bike to work, shopping, and entertainment. In addition, the Project Site's location near robust transit opportunities (high frequency bus service along Roscoe Boulevard and Van Nuys Boulevard and the future Metro East San Fernando Valley transit line) would further reduce dependence on automobile travel, reducing VMT and associated pollutant emissions. Project residents and guests would have access to a residential lobby located at ground level that would provide connectivity to the pedestrian infrastructure adjacent to and in the vicinity of the Project Site. The provision of the ground-floor commercial use would further activate the pedestrian environment of the neighborhood.

Table 3-1
Consistency with 2020-2045 RTP/SCS: Goals and Guiding Principles

Goals and Policies	Project Consistency Assessment
	Finally, the Project would include approximately 17 short-term and 192 long-term parking, for a total of 209 spaces, which would encourage bicycling as a form of transportation.
Goal 5 Reduce greenhouse gas emissions and improve air quality.	Consistent. The Project would construct housing and commercial restaurant uses near other commercial, office, and cultural uses and multiple designated Job Centers. Therefore, Project residents and employees would be able to walk and bike to work, shopping, and entertainment. In addition, the Project Site's location near robust transit opportunities (high frequency bus service along Roscoe Boulevard and Van Nuys Boulevard and the future Metro East San Fernando Valley transit line) would further reduce dependence on automobile travel, reducing VMT and associated pollutant emissions. Project residents and guests would have access to a residential lobby located at ground level that would provide connectivity to the pedestrian infrastructure adjacent to and in the vicinity of the Project Site. The provision of the ground-floor commercial use would further activate the pedestrian environment of the neighborhood. Finally, the Project would include approximately 17 short-term and 192 long-term parking, for a total of 209 spaces, which would encourage bicycling as a form of transportation.
Goal 6 Support healthy and equitable communities.	Consistent. The Project would construct housing, and commercial uses near other commercial, office, and cultural uses and add to housing diversity. Given the urban nature of the Project Site area, and location near Job Centers, Project residents and employees would be able to walk and bike to work, shopping, and entertainment uses. In addition, the Project Site's location near robust transit opportunities (high frequency bus service along Roscoe Boulevard and Van Nuys Boulevard and the future Metro East San Fernando Valley transit line) would

Table 3-1
Consistency with 2020-2045 RTP/SCS: Goals and Guiding Principles

Goals and Policies	Project Consistency Assessment
	further reduce dependence on automobile travel, reducing VMT and associated pollutant emissions. Project residents and guests would have access to a residential lobby located at ground level that would provide connectivity to the pedestrian infrastructure adjacent to and in the vicinity of the Project Site. The provision of the ground-floor commercial use would further activate the pedestrian environment of the neighborhood. Finally, the Project would include approximately 17 short-term and 192 long-term parking, for a total of 209 spaces, which would encourage bicycling as a form of transportation.
Goal 7 Adapt to a changing climate and support an integrated regional development pattern and transportation network.	Consistent. The Project includes development of mixed residential and commercial uses on an infill site in an urbanized area of the City that is near several sources of transit and Job Centers. This type of transit-oriented mixed-use project helps to reduce dependence on automobile travel and to reduce mobile-source GHG emissions.
Goal 8 Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	Not Applicable. This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system.
Goal 9 Encourage development of diverse housing types in areas that are supported by multiple transportation options.	Consistent. The Project includes development of a variety of residential units, in addition to ground floor commercial uses.
Goal 10 Promote conservation of natural and agricultural lands and restoration of habitats.	Consistent. The Project is an infill development that would not affect any natural or agricultural lands or restoration of habitats.
Guiding Principle 1 Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 2 Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system.	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.

Table 3-1
Consistency with 2020-2045 RTP/SCS: Goals and Guiding Principles

Goals and Policies	Project Consistency Assessment
Guiding Principle 3 Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing and implementing growth strategies.
Guiding Principle 4 Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 5 Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions.	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments.
Guiding Principle 6 Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies.	Not Applicable. This principle is directed toward SCAG that has the responsibility of monitoring the progress of Connect SoCal.
Guiding Principle 7 Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience.	Not Applicable. This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments.
Source: 2020-2045 RTP/SCS, 2020.	

Table 3-2
Consistency with 2020-2045 RTP/SCS: Strategy

Strategy	Project Consistency Assessment
<i>Focus Growth Near Destinations & Mobility Options</i>	
Strategy: Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.	Consistent. The Project would construct housing and neighborhood-serving commercial restaurant uses near existing sources of employment, shopping, entertainment, and robust transit opportunities (i.e., high frequency bus lines In addition, the Project Site's location near robust transit opportunities (high frequency bus service along Roscoe Boulevard and Van Nuys Boulevard and the future Metro East San Fernando Valley transit line) would further reduce dependence on automobile travel, reducing VMT and associated pollutant emissions.

Table 3-2
Consistency with 2020-2045 RTP/SCS: Strategy

Strategy	Project Consistency Assessment
	Project residents and guests would have access to a residential lobby located at ground level that would provide connectivity to the pedestrian infrastructure adjacent to and in the vicinity of the Project Site. The provision of the ground-floor commercial use would further activate the pedestrian environment of the neighborhood. Finally, the Project would include approximately 17 short-term and 192 long-term parking, for a total of 209 spaces, which would encourage bicycling as a form of transportation.
Strategy: Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets.	Consistent. The Project includes development of mixed residential and commercial uses on an infill site in an urbanized area of the City that is near several sources of transit, employment (i.e., Job Centers), shopping, and entertainment. This type of transit-oriented mixed-use project helps to reduce dependence on automobile travel and to reduce commute times.
Strategy: Plan for growth near transit investments and support implementation of first/last mile strategies.	Consistent. The Project includes development of mixed residential and commercial uses on an infill site in an urbanized area of the City that is near several sources of transit. Also, the Project includes pedestrian improvements and bicycle parking spaces. The Project's inclusion of pedestrian amenities and bicycle parking would support implementation of first/last mile strategies for people traveling to and from the Project Site from the existing bus lines.
Strategy: Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses.	Consistent. The Project includes development of mixed residential and commercial uses on an infill site, in an urbanized area of the City that is near several sources of transit, including high frequency bus lines. The Project's redevelopment of the Site would allow for the inclusion of additional needed residential units to be constructed.
Strategy: Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.	Consistent. The Project includes development of mixed residential and commercial uses on an infill site, in an urbanized area of the City that is near several sources of transit.

Table 3-2
Consistency with 2020-2045 RTP/SCS: Strategy

Strategy	Project Consistency Assessment
	In addition, the Project Site's location near robust transit opportunities (high frequency bus service along Roscoe Boulevard and Van Nuys Boulevard and the future Metro East San Fernando Valley transit line) would further reduce dependence on automobile travel, reducing VMT and associated pollutant emissions. Project residents and guests would have access to a residential lobby located at ground level that would provide connectivity to the pedestrian infrastructure adjacent to and in the vicinity of the Project Site. The provision of the ground-floor commercial use would further activate the pedestrian environment of the neighborhood. Finally, the Project would include approximately 17 short-term and 192 long-term parking, for a total of 209 spaces, which would encourage bicycling as a form of transportation.
Strategy: Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).	Consistent. The Project's location near several sources of transit, would reduce reliance of the automobile and solo car trips. Also, the Project includes pedestrian improvements and bicycle parking spaces, which would further reduce reliance on the automobile, VMT, and associated pollutant emissions. The Project would also include various Transportation Demand Management (TDM) strategies to encourage multi modal transportation and reduced VMT such as reduced parking (below typical LAMC residential and commercial parking ratios) and unbundling parking from the residential leases.
Strategy: Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking).	Consistent. The Project includes 459 vehicle parking spaces for the residential and 57 vehicle parking spaces for the commercial uses. Of these parking spaces, 30 percent would be electric vehicle (EV) spaces 10 percent of which would be full EV installed.
Promote Diverse Housing Choices	
Strategy: Preserve and rehabilitate affordable housing and prevent displacement.	Consistent. The Project Site (surface parking lot) has no existing housing units. Therefore, there is no need for tenant relocation assistance pursuant to the City's Rent

Table 3-2
Consistency with 2020-2045 RTP/SCS: Strategy

Strategy	Project Consistency Assessment
	Stabilization Ordinance and Ellis Act regulations. The Project would provide multi-family residential units, resulting in an increase of total residential units at the Project Site. The Project would provide 290 multi-family residential units, including 29 Extremely Low Income affordable housing units, resulting in an increase of both total residential units and restricted affordable units at the Project Site. Extremely Low Income units provide the deepest affordability level and benefit among the various types of deed restricted affordable units (i.e., Very Low, Low and Moderate Income) and are only available for households earning at or below 30% of the Area Median Income.
Strategy: Identify funding opportunities for new workforce and affordable housing development	Consistent. Although the Project is not responsible for identifying funding opportunities for a new workforce, the Project does include commercial restaurant uses, which would provide employment.
Strategy: Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply.	Not Applicable. This strategy is directed to jurisdictions/agencies that can create incentives and have control over regulations.
Strategy: Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions.	Consistent. Although the Project has no control over the City's policy making, the Project does include development of mixed residential and commercial uses on an infill site, in an urbanized area of the City that is near several sources of transit Also, the Project includes pedestrian improvements and bicycle parking spaces. This type of transit-oriented mixed-use project supports growth near transit as a way to reduce reliance on the automobile, VMT, and associated pollutant emissions.
Leverage Technology Innovations	
Strategy: Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space.	Consistent. The Project would include bicycle parking spaces. Also, 30 percent of the Project's vehicle parking spaces would be EV spaces.

Table 3-2
Consistency with 2020-2045 RTP/SCS: Strategy

Strategy	Project Consistency Assessment
Strategy: Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a “mobility wallet,” an app-based system for storing transit and other multi-modal payments.	Not Applicable. Although this strategy is not applicable to the Project, the Project would not inhibit its implementation.
Strategy: Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage and power generation.	Not Applicable. As a predominantly infill residential development the Project has no authority to develop sources of power.
Support Implementation of Sustainability Policies	
Strategy: Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions.	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies. However, the Project's provision of both residential and commercial uses near multiple Job Centers and robust transit options, including multiple high frequency bus lines, would allow Project residential, employees, and guests to be able to walk or bike to work, shopping, or entertainment uses, thereby reducing VMT and greenhouse gas emissions.
Strategy: Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations.	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies. However, the Project involves the development of residential and commercial uses within an HQTa and in close proximity to bus lines.
Strategy: Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space.	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies.
Strategy: Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies.	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies.
Strategy: Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region.	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies.
Strategy: Continue to support long range planning efforts by local jurisdictions.	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies.
Strategy: Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies.

Table 3-2
Consistency with 2020-2045 RTP/SCS: Strategy

Strategy	Project Consistency Assessment
implementing the Sustainable Communities Strategy.	
<i>Promote a Green Region</i>	
Strategy: Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies.
Strategy: Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies.
Strategy: Integrate local food production into the regional landscape.	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies.
Strategy: Promote more resource efficient development focused on conservation, recycling and reclamation.	Not Applicable. This strategy is directed at SCAG and other jurisdictions/agencies.
Strategy: Preserve, enhance and restore regional wildlife connectivity.	Consistent. The Project is an infill development in an urbanized area and would not interfere with regional wildlife connectivity.
Strategy: Reduce consumption of resource areas, including agricultural land.	Consistent. The Project is an infill development in an urbanized area would not affect any agricultural land.
Strategy: Identify ways to improve access to public park space.	Consistent. The Project is an infill development in an urbanized area would not interfere with access to public park space.
Source: 2020-2045 RTP/SCS, 2020.	

Consistency with TPP Criterion #2(a) – The Project contains at least 50 percent residential use.

Criterion 2(a) requires that a project “Contains at least 50 percent residential use, based on total building square footage and if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75.”

The new uses include 183,631 square feet of new floor area (mixed-use Proposed Building, canopy in the Parking Building, and the Warehouse Building. The new residential floor area is 170,568 square feet. The new uses are approximately 93 percent residential.

The total Project (existing and proposed) includes 339,490 square feet of new floor area. The total residential floor area is 361,086 square feet. The total uses are approximately 94 percent residential.

As such, the Project would be consistent with this Criterion.

Consistency with TPP Criterion #2(b) – The Project includes a minimum net density of at least 20 units per acre.

Criterion 2(b) requires that a project “Provides a minimum net density of at least 20 units per acre.”

The Site is 178,575.5 square feet (4.13 acres) after dedication. The density of the Project (proposed 200 new units + existing 194 units) would be 95 residential dwelling units per acre.¹

As such, the Project would be consistent with this Criterion.

Consistency with TPP Criterion #2(c) – The Project Site is located within one-half mile of a major transit stop or a high quality transit corridor included in the RTP/SCS.

Criterion 2(c) requires that a project “Is located within one-half mile of a major transit stop or high-quality transit corridor included in the RTP/SCS.

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 21155 (b) states that a “major transit stop” is defined in PRC Section 21064.3, except that, for purposes of Section 21155 (b), it also includes major transit stops that are included in the applicable regional transportation plan.

Public Resources Code (PRC) Section 21155 (b) defines a “high-quality transit corridor” (HQTC) as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

The Project meets both of the definitions to qualify for this criterion. The Project Site is located in an urban area served by multiple local bus lines operating with service intervals of 15 minutes or less during morning and afternoon peak commute periods along corridors in close proximity to the Project Site, including Roscoe Boulevard and Van Nuys Boulevard. The Project Site is located 725 feet south of the intersection of Van Nuys Boulevard and Roscoe Boulevard. Metro Line 152 travels east-west along Roscoe Boulevard. Metro Line 233 travels north-south along Van Nuys Boulevard. See **Table 3-3**, which shows the qualifying lines. Thus, the Project Site is located within a half mile of a major transit stop.

In addition, Metro is currently constructing the East San Fernando Valley Light Rail Transit Line, running north-south along Van Nuys Boulevard, with a station proposed at Roscoe Boulevard and Van Nuys Boulevard. The Line is identified in the 2020-2045 RTP/SCS as part of the 2045 Plan Transit Network.

As such, the Project is consistent with this Criterion.

¹ (200 + 194 units) / 4.13 acres = 95 units / acre.

**Table 3-3
Transit Priority Analysis**

Line	Direction	# Trips	Total Trips	Average Frequency	Qualifies?
Metro 152	Westbound	12 AM Peak Hours trips	29	14.5 minutes	Yes
		17 PM Peak Hour trips			
	Eastbound	12 AM Peak Hours trips	30	14 minutes	
		18 PM Peak Hour trips			
Metro 233	Northbound	16 AM Peak Hours trips	39	10.7 minutes	Yes
		23 PM Peak Hours trips			
	Southbound	12 AM Peak Hours trips	36	11.67 minutes	
		24 PM Peak Hours trips			

Peak Periods are considered to be between 6:00 to 9:00 AM (180 minutes) and 3:00 to 7:00 PM (240 minutes) for a total of 420 minutes. Bus routes must have a service frequency of 15 minutes or less for the entire duration of the peak hour periods.

To determine the eligibility of the bus line, the average number of minutes per trip for each direction is calculated separately. If one or both directions fail to meet the 15 minute frequency limit, the entire bus line is ineligible for a Major Transit Stop.

The total number of trips from the point of origin during peak hours (Monday to Friday) is used. A trip is included if its median time falls within the peak hour.

To calculate the median time, the time at trip origin is subtracted from the time at arrival at final station, divided by two, and then added to origin time.

The total peak hour time (420 minutes) is then divided by the number of trips for the average number of minutes per trip.

<https://www.metro.net/riding/schedules/?line=152-13157>

<https://www.metro.net/riding/schedules/?line=233-13157>

CAJA Environmental Services, August 2022.

4 Mitigation Measures From Prior EIRS

4.1 Incorporation of Applicable Mitigation Measures from Prior EIRs

Public Resources Code (PRC) Section 21151.2 requires that a Transit Priority Project (TPP) also incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. Prior EIRs applicable to the Project include SCAG's 2020-2045 RTP/SCS Program EIR.

The Mitigation Monitoring and Reporting Program for the 2020-2045 RTP/SCS Program EIR (SCAG MMRP) includes programmatic mitigation measures to be implemented by SCAG and project-level mitigation measures that SCAG encourages local agencies to implement, as appropriate and feasible, as part of project-specific environmental review.

As stated by SCAG, SCAG has no authority to impose mitigation measures on individual projects for which it is not the lead agency. However, for projects seeking to use CEQA streamlining and/or to tier from the Program EIR, project-level mitigation measures included in the Program EIR (or comparable measures) should be required by the local lead agency as appropriate and feasible. Many lead agencies have existing regulations, policies, and/or standard conditions of approval that address potential impacts.

Nothing in the Program EIR is intended to supersede existing regulations and policies of individual jurisdictions. Since SCAG has no authority to impose mitigation measures, mitigation measures to be implemented by local jurisdictions are subject to a lead agency's independent discretion as to whether measures are applicable to projects in their respective jurisdictions. Lead agencies may use, amend, or not use measures identified in the Program EIR, as appropriate, to address project-specific conditions. The determination of significance and identification of appropriate mitigation is solely the responsibility of the lead agency.

To comply with PRC Section 21151.2, the City of Los Angeles (City) has reviewed all mitigation measures contained in the SCAG MMRP and determined their applicability to the Project. For each such mitigation measure, the City considered whether to incorporate the mitigation measure from SCAG's Program EIR or whether an equally effective existing City mitigation measure, standard condition of approval, or other City regulation or federal, state, or regional regulation would supersede SCAG's mitigation measures.

A discussion of the City's applicability determination is found in **Table 4-1**.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
AESTHETICS	
PMM AES-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. c) Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas. d) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements. e) Retain or replace trees bordering highways, so that clear-cutting is not evident. f) Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas. g) Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity; h) Use see-through safety barrier designs (e.g. railings rather than walls)	No mitigation applies. PRC Section 21099, enacted by Senate Bill 743, 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.” Consistent with SB 743, City of Los Angeles Zoning Information File ZI No. 2452 indicates that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact shall not be considered a significant impact for infill projects within Transit Priority Areas (TPAs) pursuant to CEQA. The Project includes development of a mixed-use building with 200 dwelling units and 2,060 square feet of commercial use within a City-designated TPA (intersection of Van Nuys Boulevard and Roscoe Boulevard) and within a SCAG-designated High Quality Transit Area (HQTA). As such, the Project’s aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. Thus, incorporation of this mitigation measure into the Project is not required.
PMM AES-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:	No mitigation applies. See discussion of the applicability of PMM AES-1 above.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
a) Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable. b) Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors. c) Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria. d) Design projects consistent with design guidelines of applicable general plans. e) Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape. f) Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows: - use transparent panels to preserve views where sound walls would block views from residences; - use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height; - construct sound walls of materials whose color and texture complements the surrounding landscape and development; g) Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding	

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation	
PMM AES-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. or as otherwise required by applicable local rules or ordinances. c) Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. d) Use unidirectional lighting to avoid light trespass onto adjacent properties. e) Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses. f) Provide structural and/or vegetative screening from light-sensitive uses. g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses. h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. i) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.	No mitigation applies. See discussion of the applicability of PMM AES-1 above.
AGRICULTURAL RESOURCES	
PMM AG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to address potential adverse effects on agricultural	No mitigation applies. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site is not included in the Important

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Require project sponsors to mitigate for loss of farmland by providing permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential. b) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance. c) Maintain and expand agricultural land protections such as urban growth boundaries. d) Provide for mitigation fees to support a mitigation bank¹ that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands. e) Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access. f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.	Farmland category.¹ Therefore, the Project would not 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. Thus, incorporation of this mitigation measure into the Project is not required.
PMM AG-2: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects on Williamson Act contracts to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Project relocation or corridor realignment to avoid lands in Williamson Act contracts. b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts	No mitigation applies. The Project Site is not zoned for agricultural use, and the site is not under Williamson Act contract.² Therefore, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. Thus, application of this mitigation measure to the Project is not required.

¹ State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland, 1998.

² Ibid.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
(Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.	
PMM AG-3: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland to maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Minimize construction related impacts to agricultural and forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with agriculture and forestry resources.	No mitigation applies. Neither the Project Site nor the surrounding area is zoned for forest land, timberland, or Timberland Production. As such, the Project would not result in any conflicts any zoning related to forest land, timberland, or Timberland Production zoning. The Project Site is located in an urbanized area of the City and has been developed in the recent past. Thus, incorporation of this mitigation measure is not required.
PMM AG-4: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land. b) Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management. c) Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that	No mitigation applies. Because the Project Site is currently not used for any agricultural uses and is not forest land, no agricultural use or forest land would be converted. The Project Site is located in an urbanized area of the City and has been developed in the recent past. Thus, incorporation of this mitigation measure is not required.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
economically viable farming operations are not interrupted. PMM AG-5: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.	
AIR QUALITY	
PMM AQ-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Minimize land disturbance. b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes. c) Cover trucks when hauling dirt.	No mitigation applies. The analysis of the Project's potential air quality impacts in Section 5 (Sustainable Communities Environmental Analysis) concluded that the Project would not generate pollutant emissions in excess of applicable significance thresholds and would not have the potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation. No significant impacts related to this issue have been identified, and no mitigation measures are required. Thus, incorporation of this mitigation measure is not required.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
d) Stabilize the surface of dirt piles if not removed immediately. e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads. f) Minimize unnecessary vehicular and machinery activities. g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities. i) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications. j) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. k) Ensure that all construction equipment is properly tuned and maintained. l) Minimize idling time to 5 minutes—saves fuel and reduces emissions. m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators. o) Develop a traffic plan to minimize community impacts as a result of traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes.	

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
Provide a flag person to guide traffic properly and ensure safety at construction sites. Project sponsors should consider developing a goal for the minimization of community impacts. p) As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site. q) Require projects to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). In the event that construction equipment cannot meet to Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible. r) Projects located within the South Coast Air Basin should consider applying for South Coast AQMD "SOON" funds which provides funds to applicable fleets for the purchase of	

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects. t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs. u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors). v) As applicable for airport projects, the following measures should be considered: a. Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible as allowed per Federal Aviation Administration guidelines. b. Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project. c. Require the use of ground service equipment (GSE) that can operate on battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum. w) As applicable for port projects, the following measures should be considered: a. Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE). b. Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress.	

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
c. Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power. d. Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized. e. Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin. f. Encourage the participation in the Green Ship Incentives. g. Offer incentives to encourage the use of on-dock rail. x) As applicable for rail projects, the following measures should be considered: a. Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards. y) Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit. z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters. a. Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside.	

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
b. Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued. c. Disclose the potential increase in energy costs for running the HVAC system to prospective residents. d. Provide information to residents on where MERV filters can be purchased. e. Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units. f. Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time. g. Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units. h. Set criteria for assessing progress in installing and replacing the enhanced filtration units; and i. Develop a process for evaluating the effectiveness of the enhanced filtration units. aa) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.	
BIOLOGICAL RESOURCES	
PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Require project design to avoid occupied habitat, potentially suitable habitat, and	No mitigation applies. The Project Site is located in an urbanized and developed area of the City and has been fully developed in the recent past. There are 141 existing onsite decorative trees and palms in the parking lot and along Van Nuys Boulevard. None is a protected species.³ None of these trees is considered a "protected tree," as defined by the City.⁴ However, these trees could potentially provide nesting sites for migratory birds. Thus, the Project would be

³ Tree Report, The Tree Resource, May 21, 2020.

⁴ Protected trees as defined by the City include oak trees (*Quercus* spp.) and Southern California black walnut trees (*Juglans californica*), western sycamore trees (*Platanus racemosa*), and California bay trees (*Umbellularia californica*).

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
designated critical habitat, wherever practicable and feasible. b) Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include: i. Impact minimization strategies ii. Contribution of in-lieu fees for in-kind conservation and mitigation efforts iii. Use of in-kind mitigation bank credits iv. Funding of research and recovery efforts v. Habitat restoration vi. Establishment of conservation easements vii. Permanent dedication of in-kind habitat c) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies. d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species. e) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources. f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation.	required to comply with the Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season (February 15th to August 15th) to ensure that significant impacts to migratory birds would not occur. Compliance with these existing regulations would ensure that no significant impacts to nesting birds would occur. Thus, application of this mitigation measure to the Project is not required.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
g) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact. h) Appoint a qualified biologist to monitor implementation of mitigation measures. i) Schedule construction activities to avoid sensitive times for biological resources (e.g. steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased. j) Develop an invasive species control plan associated with project construction. k) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife. l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance. m) Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.	
PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and	No mitigation applies. The Project Site is located in an urban area of the City and has previously been developed. No riparian habitat or other sensitive natural communities are located on the Project Site. Therefore, development of the Project would not result in adverse effects to any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service. Thus, application of this mitigation measure to the Project is not required.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
endangered species afforded protection pursuant to the federal ESA. b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino. c) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code. d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds. e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season. f) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-beaming mammals, are actively using the areas in conjunction with breeding activities. g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. h) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats	

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
and develop appropriate compensatory mitigation, where required. i) Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities. j) Appoint a qualified wetland biologist to monitor implementation of mitigation measures. k) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased. l) When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified wetland scientist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects. m) Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant an adopted regional conservation plan. n) Install fencing and/or mark sensitive habitat to be avoided during construction activities. o) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified wetland biologist. p) Revegetate with appropriate native vegetation following the completion of construction activities, as identified by the qualified wetland biologist. q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species). r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native	

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.	
PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency. a) Require project design to avoid federally protected aquatic resources consistent with the provisions of Sections 404 and 401 of the CWA, wherever practicable and feasible. b) Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered Waters Of the State of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW. c) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACE's Final Compensatory Mitigation Rule. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources	No mitigation applies. The Project Site is not located on protected wetlands or water features that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers or any other public agencies and/or Lead Agencies. Thus, application of this mitigation measure to the Project is not required.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation: -- Permittee-responsible mitigation -- Contribution of in-kind in-lieu fees -- Use of in-kind mitigation bank credits -- Where avoidance is determined to be infeasible, and d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, or applicable County Special Area Management Plan (SAMP), the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities: -- Avoidance -- Impact Minimization -- On-site alternatives -- Off-site alternatives e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.	
PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, as applicable and feasible. Such	No mitigation applies. The Project Site is located in an urbanized and developed area of the City and has been fully developed in the recent past. The Project Site is not part of a migratory wildlife corridor or native wildlife nursery. Therefore, the Project would not

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino. b) Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans. c) Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season. d) Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31. e) Prohibit construction activities with 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. f) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season. g) When feasible and practicable, proposed projects will be designed to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors. h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site. i) Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow	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. Thus, application of this mitigation measure to the Project is not required.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
choke points that could reduce function of recognized movement corridor. j) Require review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation. k) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat). l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches. m) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Retrofitting of existing infrastructure in project areas should also be considered for wildlife crossings for purposes of mitigation. n) Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction. o) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable: -- Wildlife movement buffer zones -- Corridor realignment -- Appropriately spaced breaks in center barriers -- Stream rerouting -- Culverts -- Creation of artificial movement corridors such as freeway under- or overpasses -- Other comparable measures	

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
p) Where the lead agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions. q) Incorporate applicable and appropriate guidance (e.g. FHWA-HEP-16- 059), as well as best management practices, to benefit pollinators with a focus on native plants.	
PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources. b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist. c) If specific project area trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist. d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site,	No mitigation applies. As stated previously, there are no protected tree species on the Project Site. There are 141 existing onsite decorative trees and palms in the parking lot and along Van Nuys Boulevard, some or all of which could be removed as part of the Project. The Applicant would be required to plant replacement trees on or adjacent to the Project Sites in conformance with the City’s Urban Forestry Division requirements for Project landscaping and tree replacement and planting. Any on-site tree removal will comply with the City’s Tree Replacement Program, and any removal and replacement of street trees in the public right-of-way will be to the satisfaction of the Urban Forestry Division, Bureau of Street Services requirements. The Project is required to provide 1 tree per 4 units. With 394 units, the Project is required to provide 99 trees. In addition, the Project is required to provide 1 tree for per 4 surface parking spaces. With 12 surface spaces, this would be 3 trees. The Project would meet this requirement by providing 113 trees. As such, the Project would not have the potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Thus, incorporation of the mitigation measure is not required.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. e) Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree. f) Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree. g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist. h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed	

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources i) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include: -- Avoidance strategies -- Contribution of in-lieu fees -- Planting of replacement trees -- Re-landscaping areas with native vegetation post-construction -- Other comparable measures developed in consultation with local agency and certified arborist.	
PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs. b) Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP. c) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a)	No mitigation applies. The Project Site is not subject to any provisions of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Furthermore, the Project Site is not within or adjacent to an existing Significant Ecological Area. Thus, incorporation of the mitigation measure is not required.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
of the federal Endangered Species Act or Section 2081 of the California ESA, shall be developed to support issuance of an incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in SMM-BIO-2, where applicable.	
CULTURAL RESOURCES	
PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Pursuant to CEQA Guidelines Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historical resources were identified. b) During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center. c) Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These	Compliance with SCAG mitigation applies as an Applicable Incorporated Comparable City Condition. The City, as lead agency, has determined that this mitigation measure shall be incorporated into the Project as a standard condition and shall be tailored to specifically address Project-specific impacts. <i>Historical Resources</i> The building was identified in SurveyLA, the City of Los Angeles' citywide historic resources survey, as appearing eligible for listing in the National Register of Historic Places (National Register), California Register of Historical Resources (California Register) as well as a local Historic Cultural Monument (HCM) as an "excellent example of Corporate International architecture; designed by significant Los Angeles architectural firm Welton Becket and Associates." Due to alterations as part of its 2016 rehabilitation, specifically replacement of the windows, the building does not appear to retain sufficient integrity for listing in the National Register, California Register, or as a local HCM. The Project conforms with the Secretary's Standards and will not pose a direct or indirect impact to any of the three identified historical resources in the immediate vicinity within the study area (Panorama Bank Building, Titus Building, Panorama Plaza Building). Therefore, the Project is anticipated to have a less than significant impact on historical resources.⁵ <i>Archaeological Resources</i>

⁵ Historic Resources Report, Jenna Snow Historic Preservation Consulting, May 2022.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
mitigation measures may include, but are not limited to the following: -- Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible. -- Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources. d) If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior's Standards for the Treatment of Historic Properties should be used to the maximum extent possible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and construction activities and be provided to the Lead Agency for review and approval. e) If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the	The South Central Coast Information Center (SCCIC) conducted a records search for the Project Site and a half-mile radius around the Site. The records search was completed in October 2020. The search did not identify any known archaeological resources on the Project Site.⁶ The Project Applicant must comply with the City's standard condition of approval related to inadvertent discovery of unknown archaeological resources. This standard City condition is substantially similar to PMM CULT-1. In the event that any subsurface cultural resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5. At which time the applicant shall notify the City and consult with a qualified archaeologist who shall evaluate the find in accordance with federal, state, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2, and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. Compliance with this condition would ensure that Project impacts related to unknown archaeological resources would be less than significant.

⁶ Archaeological Response, South Central Coast Information Center, October 3, 2020.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the SOI PQS. Recordation should meet the SOI Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the Lead Agency. f) During the project planning phase, obtain a qualified archaeologist, defined as one who meets the SOI PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the project area has been previously surveyed and whether resources were identified. g) Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information. h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. Survey shall be conducted where the records indicate that no previous survey has been conducted, or if survey has not been conducted within the past 10 years. If tribal resources are identified during tribal outreach, consultation, or the record search, a Native American representative traditionally affiliated with the project area, as identified by the NAHC, shall be given the opportunity to provide a representative or	

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
monitor to assist with archaeological surveys. i) If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources determined significant or unique through Phase II testing, and avoidance is not possible, appropriate resource-specific mitigation measures should be established by the lead agency, in consultation with consulting tribes, where appropriate, and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Should the project require extended Phase I testing, Phase II evaluation, or Phase III data recovery, a Native American representative traditionally affiliated with the project area, as indicated by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with the archaeological assessments. The long-term disposition of archaeological materials collected from a significant resource should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinterment in an area designated by the tribe. j) In cases where the project area is developed and no natural ground surface is exposed, sensitivity for subsurface resources should be assessed based on review of literature, geology, site development history, and	

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
consultation with tribal parties. If this archaeological desktop assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the Lead Agency in consultation with a qualified archaeologist, the project should retain an archaeological monitor and, in the case of sensitivity for tribal resources, a tribal monitor, to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the SOI PQS. k) Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated. l) Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant, and tribal consultation can be conducted, in the case of tribal resources. If the archaeologist determines that the discovery is significant, its long-term disposition should be determined in consultation with the affiliated tribe(s); this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.	
PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, as applicable and feasible. Such measures	Compliance with SCAG mitigation applies as an Applicable Incorporated Comparable City Condition. The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
may include the following or other comparable measures identified by the Lead Agency: a) In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required. b) If any discovered remains are of Native American origin, as determined by the county Coroner, an experienced osteologist, or another qualified professional: -- Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. In some cases, it is necessary for the Lead Agency, qualified archaeologist, or developer to also reach out to the NAHC to coordinate and ensure notification in the event the Coroner is not available. -- If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American	City conditions and state regulations that are equal to or more effective than PMM CULT-2. The Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. No known human remains exist at the Project Site. In the event that unknown human remains were encountered at the site, the Applicant would be required to comply with the State's Health and Safety Code Section 7050.5, which provides that in the event of discovery or recognition of any human remains at the Project Sites, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Los Angeles County Coroner has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the PRC. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC). Thus, application of this mitigation measure to the Project is not required.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.	
GEOLOGY AND SOILS	
PMM GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. b) Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program. c) Consistent with the requirements of the SWRCB and local regulatory agencies with	Compliance with SCAG mitigation applies as an Applicable Incorporated Comparable City Condition. The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM-GEO-1. The Applicant would be required by the City to implement the provisions of the South Coast Air Quality Management District's (SCAQMD) Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site. Also, the Applicant would be required to 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 any ground-disturbing activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation. d) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.	City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if ground-disturbing activities occur during a rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during ground-disturbing activities. Additionally, during the Project's operational phase, most of the Project Site would be developed with impervious surfaces, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. Therefore, with compliance with applicable regulatory requirements, development of the Project would not cause or exacerbate soil erosion or loss of topsoil. Thus, application of this mitigation measure to the Project is not required.
PMM GEO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the Public Resources Code (PRC), adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices from the 2010 Society for Vertebrate Paleontology (SVP) standard procedures for the assessment and mitigation of adverse impacts to paleontological resources.	Compliance with SCAG mitigation applies as an Applicable Incorporated Comparable City Condition. This mitigation measure is not incorporated, because the City has determined that the existing regulatory measures listed below would apply to the Project and is equal to or more effective than PMM-GEO-2. The Project Applicant must comply with the City's standard condition of approval related to the inadvertent discovery of unknown paleontological resources. In the event that any paleontological resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
b) Obtain review by a qualified paleontologist (e.g. who meets the SVP standards for a Principal Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface. c) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources. d) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible: 1. All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered. 2. A qualified paleontologist prepares a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during construction. The PRMP should adhere to and incorporate the performance standards and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. If unique paleontological resources are encountered during construction, use a qualified	avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety will be notified immediately, and all work will cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Compliance with this condition would ensure that Project impacts related to unknown paleontological resources would be less than significant.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
paleontologist to oversee the implementation of the PRMP. 3. Monitor ground disturbing activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontological monitor meeting the standards of the SVP or the BLM to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols. 4. Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a paleontological monitor to be present during ground disturbance in these areas. e) Avoid routes and project designs that would permanently alter unique geological features. f) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education. g) Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility. h) Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report stating that the paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the lead CEQA and the repository curating the collected artifacts, and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials, results of specimen processing, analysis, and research, and final curation arrangements.	
GREENHOUSE GAS EMISSIONS	
PMM GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to	Compliance with SCAG mitigation applies as an Applicable Incorporated Comparable City Condition. As discussed in detail in Section 5 (Sustainable Communities Environmental Impact

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
reduce substantial adverse effects related to greenhouse gas emissions, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including: i. Use energy efficient materials in building design, construction, rehabilitation, and retrofit. ii. Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. iii. Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight. iv. Incorporate passive environmental control systems that account for the characteristics of the natural environment. v. Use high-efficiency lighting and cooking devices. vi. Incorporate passive solar design. vii. Use high-reflectivity building materials and multiple glazing. viii. Prohibit gas-powered landscape maintenance equipment. ix. Install electric vehicle charging stations. x. Reduce wood burning stoves or fireplaces. xi. Provide bike lanes accessibility and parking at residential developments. b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines. c) Include off-site measures to mitigate a project's emissions.	Analysis), the Project's generation of GHG emissions would not be considered cumulatively considerable, as the Project would not conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing GHG emissions. Thus, incorporation of this mitigation measure into the Project is not required. Moreover, pursuant to California Public Resources Code Section 21159.28(a), a Sustainable Communities Environmental Assessment prepared for a residential or mixed use development that is consistent with the RTP/SCS, such as the Project, need not analyze or discuss project specific or cumulative greenhouse gas emission impacts from mobile source emissions generated by cars and light duty trucks.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to: i. Use energy and fuel-efficient vehicles and equipment; ii. Deployment of zero- and/or near zero emission technologies; iii. Use lighting systems that are energy efficient, such as LED technology; iv. Use the minimum feasible amount of GHG-emitting construction materials; v. Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production; vi. Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse; vii. Incorporate design measures to reduce energy consumption and increase use of renewable energy; viii. Incorporate design measures to reduce water consumption; ix. Use lighter-colored pavement where feasible; x. Recycle construction debris to maximum extent feasible; xi. Plant shade trees in or near construction projects where feasible; and xii. Solicit bids that include concepts listed above. e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following: i. Promote transit-active transportation coordinated strategies; ii. Increase bicycle carrying capacity on transit and rail vehicles;	

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
iii. Improve or increase access to transit; iv. Increase access to common goods and services, such as groceries, schools, and day care; v. Incorporate affordable housing into the project; vi. Incorporate the neighborhood electric vehicle network; vii. Orient the project toward transit, bicycle and pedestrian facilities; viii. Improve pedestrian or bicycle networks, or transit service; ix. Provide traffic calming measures; x. Provide bicycle parking; xi. Limit or eliminate park supply; xii. Unbundle parking costs; xiii. Provide parking cash-out programs; xiv. Implement or provide access to commute reduction program; f) Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network; g) Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and h) Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that: i. Provide car-sharing, bike sharing, and ride-sharing programs; ii. Provide transit passes; iii. Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services; iv. Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle;	

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
v. Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms; vi. Provide employee transportation coordinators at employment sites; vii. Provide a guaranteed ride home service to users of non-auto modes. i) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles; j) Land use siting and design measures that reduce GHG emissions, including: i. Developing on infill and brownfields sites; ii. Building compact and mixed-use developments near transit; iii. Retaining on-site mature trees and vegetation, and planting new canopy trees; iv. Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and v. Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse. k) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible.	
HAZARDS AND HAZARDOUS MATERIALS	
	Compliance with SCAG mitigation as an Applicable Incorporated Comparable City

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
PMM HAZ-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials. b) Specify Project requirements for interim storage and disposal of hazardous materials during construction and operation. Storage and disposal strategies must be consistent with applicable federal, state, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the business plan for projects as applicable and appropriate. c) Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following: -- The types of hazardous materials or chemicals stored and/or used on-site,	Condition. This mitigation measure is not incorporated, because the City has determined that a Phase I Environmental Site Assessment has been prepared for the Project that did not identify any recognized environmental concerns (RECs) in connection with the Project Site. Compliance with existing regulatory requirements would apply to the Project and are equal to or more effective than the PMM HAZ-1. The types of hazardous materials that would be used during construction of the Project would be typical of those hazardous materials necessary for construction of a residential development (e.g., paints, solvents, fuel for construction equipment, building materials, etc.). Although construction of the Project would require the temporary transport, use, and disposal of hazardous waste, construction activities associated with Project would be required to comply with all applicable federal, state, and local regulations governing such activities. The Project would use common types of cleaning products, paint, petroleum products, etc. and would not require the routine transport, use, or disposal of hazardous materials that would pose a significant hazard to the public or environment. Thus, application of this mitigation measure to the Project is not required.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
such as petroleum fuel products, lubricants, solvents, and cleaning fluids. -- The location of such hazardous materials. -- An emergency response plan including employee training information. -- A plan that describes the way these materials are handled, transported and disposed. d) Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction. e) Avoid overtopping construction equipment fuel gas tanks. f) Properly contain and remove grease and oils during routine maintenance of construction equipment. g) Properly dispose of discarded containers of fuels and other chemicals. h) Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible. i) Identify and implement more stringent tank car safety standards. j) Improve rail transportation route analysis, and modification of routes based on that analysis. k) Use the best available inspection equipment and protocols and implement positive train control. l) Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size. m) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments. n) Notify in advance county and city emergency operations offices of all crude oil shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident. o) Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail	

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
routes used by trains carrying crude oil identified. p) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training. q) Undertake annual emergency responses scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies.	
PMM HAZ-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce hazards related to the reasonably foreseeable upsets and accidents involving the release of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: Require implementation of safety standards regarding transport of hazardous materials, including but not limited to the following: a) Removal of the most volatile elements, including flammable natural gas liquids, prior to shipment; b) More stringent tank car safety standards; c) Improved rail transportation route analysis, and modification of routes based on that analysis; d) Utilization of the best available inspection equipment and protocols, and implementation of positive train control; e) Reduced train car speeds to 40 miles per hour when passing through urbanized areas of any size; f) Limitations on storage of hazardous materials tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments; g) Advance notification to county and city emergency operations offices of all crude oil and hazardous materials shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident;	Not Applicable. The Project does not include the shipment of flammable liquids and other hazardous materials and does not include any rail transportation. Thus, incorporation of this mitigation measure is not required.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
h) Quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying hazardous materials.	
PMM HAZ-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release of hazardous materials within one-quarter mile of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible. b) Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.	Not Applicable. The Project is located within 0.25 mile of the following schools: ● Panorama High School, located at 8015 Van Nuys, 390 feet south of the Site. ● Burke High School and East Valley New Continuation School, co-located at 14630 Lanark Street, 600 feet southwest of the Site. ● Michelle Obama Elementary School, located at 8150 Cedros Avenue, 420 feet west of the Site. The Phase I has revealed no evidence of recognized environmental conditions in connection with the Site. However, as discussed previously, the Project is a typical mixed-use (residential and commercial) development that would not emit, handle or transport hazardous materials. Thus, application of this mitigation measure is not required.
PMM HAZ-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to projects that are located on a site which is included on the Cortese List, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning,	Not Applicable. The Project Site is not included on any list compiled pursuant to Government Code Section 65962.5.⁷ Thus, the Project would not create a hazard to the public or the environment as a result of being listed on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Thus, application of this mitigation measure is not required.

⁷ Department of Toxic Substance Control, <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress>, accessed June 2, 2022.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
environmental clearance, and construction for projects. b) Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer. c) Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action. d) Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans. e) Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building. f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps.	

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency. h) Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority. i) Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies. j) Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building. k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local	

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site. l) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction. m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915-25919.7; and other local regulations. n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM, lead based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law. o) Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or	

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.	
PMM HAZ-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions. b) Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks; c) Continue to evaluate lifeline routes for movement of emergency supplies and evacuation.	Not Applicable. The City has determined that this mitigation measure does not apply to the Project, because the mitigation measure is directed toward municipalities with control over transportation/circulation, conveyance of emergency information, and evaluation of emergency routes. The mitigation measure is not applicable to the Project.
HYDROLOGY AND WATER QUALITY	
PMM HYD-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction. b) Implement Best Management Practices to reduce the peak stormwater runoff from the	Compliance with SCAG mitigation as an Applicable Incorporated Comparable City Condition. The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM HYD-1. The Project would be required to comply with existing regulatory requirements pertaining to water quality standards and waste discharge requirements during construction and operation, as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB) and the City. The Project would comply with Los Angeles Municipal Code (LAMC) Chapter IX, Division 70, which addresses erosion control during grading,

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
project site to the maximum extent practicable. c) Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control. d) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. e) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings. f) Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse: g) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project. h) Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities. i) Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase. j) Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff. k) Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other	excavations, and fills. Project construction activities would require grading, excavation, and foundation permits or approvals from the City, which would include requirements and standards designed to limit erosion. The Project would also be designed to comply with the City's Low Impact Development (LID) Ordinance. Prior to the issuance of grading permits, the Applicant would submit a LID Plan to the City's Bureau of Sanitation (LASAN) Watershed Protection Division for review and approval. The LID Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. The Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. Compliance with the City's discharge requirements would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements and minimize soil erosion and sedimentation from entering the storm drains during the construction period. During operation the Project would be required to comply with the City's LID Ordinance. The LID Ordinance applies to all development and redevelopment in the City that requires replace or creates more than 500 square feet of impervious area. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project would be required to capture and treat the runoff volume produced by the 85th percentile storm event 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 Stormwater and Urban Runoff Pollution Control Ordinance, including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process. l) Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels. m) Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.	Consistent with the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 181,899 and No. 183,833), the Project would be required to adhere to City discharge requirements and would implement BMPs meant to reduce stormwater pollution during demolition, grading, and construction activities. Thus, application of this mitigation measure to the Project is not required.
PMM HYD-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Avoid designs that require continual dewatering where feasible. For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code. b) Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge,	No mitigation applies. The Project Site is located in a highly urbanized area of the City that is largely and is not a significant area of groundwater recharge. Thus, application of this mitigation measure to the Project is not required.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
and preserve wildlife habitat. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation. c) Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface. d) Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.	
PMM HYD-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.	No mitigation applies. The Project Site is not in an area susceptible to floods, tsunamis, or seiches. Therefore, the Project would not risk release of pollutants due to inundation by floods, tsunamis, or seiches. Thus, incorporation of this mitigation measure is not required.
LAND USE AND PLANNING	
PMM LU-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Facilitate good design for land use projects that build upon and improve existing circulation patterns b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by: -- Selecting alignments within or adjacent to existing public rights of way.	No mitigation applies. The Project does not include the development of new roadway facilities and would not otherwise physically divide a community. Thus, incorporation of this mitigation measure is not required.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
-- Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project. -- Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles). c) Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to: -- Alignment shifts to minimize the area affected. -- Reduction of the proposed right-of-way take to minimize the overall area of impact. -- Provisions for bicycle, pedestrian, and vehicle access across improved roadways.	
PMM LU-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified modify the transportation or land use project to eliminate the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation.	No mitigation applies. As discussed in Section 5 (Sustainable Communities Environmental Impact Analysis), the Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect, and no mitigation measures are required. The Project is consistent with the General Plan, zoning and permitted development rights. Thus, incorporation of this mitigation measure into the Project is not required.
MINERAL RESOURCES	
PMM MIN-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project	No mitigation applies. The Project Site is located in an urbanized part of the City. There are no known mineral resources on the Project Site

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
can and should consider mitigation measures to reduce the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects. b) Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures such as: 1) Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. 2) Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site. 3) Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations. 4) Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and	or in the vicinity. Thus, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. Thus, application of this mitigation measure to the Project is not required.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
zoning that allow for mining of mineral resources.	
NOISE	
PMM NOISE-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Install temporary noise barriers during construction. b) Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses. c) Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance d) Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. e) Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance. f) Designate an on-site construction complaint and enforcement manager for the project. g) Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and	Compliance with SCAG mitigation as an Applicable Incorporated Comparable City Condition. The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM NOISE-1. The Project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project excess of standards established in the local general plan or noise ordinance. The Project would comply with LADBS building regulations, the City's Noise Ordinance, and LAMC requirements including Section 112.05. Additionally, the Project would not result in any significant operational noise impacts. Thus, application of this mitigation measure to the Project is not required.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
exhaust ports on power equipment shall be muffled or shielded. h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. i) Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors. j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction. k) Using rubberized asphalt or “quiet pavement” to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned. l) Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant. m) Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses.	

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
n) Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance. o) Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction. p) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction. q) Use of portable barriers in the vicinity of sensitive receptors during construction. r) Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts. s) Monitor the effectiveness of noise attenuation measures by taking noise measurements. t) Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities. u) Construct sound reducing barriers between noise sources and noise-sensitive land uses. v) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.	

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
w) Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures. x) Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible.	
PMM NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations. b) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds. c) For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain. d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation. e) Properly maintain construction equipment and outfit construction equipment with the	Compliance with SCAG mitigation as an Applicable Incorporated Comparable City Condition. The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM NOISE-2. The Project would not expose persons to or generate excessive groundborne vibration or noise. Ground-borne vibration levels resulting from construction activities occurring within the Project Site were estimated by data published by the FTA. Construction activities that would have the potential to generate low levels of groundborne vibration within the Project site include grading.. During Project operation, the proposed land uses at the Project Site would not result in a substantive increase of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, these trips would typically only occur once a week and would not be any different than those presently occurring in the vicinity of the Project Site. As such, vibration impacts associated with operation of the Project would be less than significant.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
best available noise suppression devices (e.g., mufflers, silences, wraps). f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.	
POPULATION AND HOUSING	
PMM POP-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people. b) Prioritize the use existing ROWs, wherever feasible. c) Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction. d) Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead Agency and encouraged by the SCS (primarily TPAs, where applicable). e) When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.	No mitigation applies. No housing is currently located on the Project Site, and no housing would be displaced as a result of the Project. Thus, application of this mitigation measure to the Project is not required.
PUBLIC SERVICES	
PMM PSP-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:	Compliance with SCAG mitigation as an Applicable Incorporated Comparable City Condition. The City has determined that existing regulations would apply to the Project that are equal to or more effective than PMM PSP-1. In accordance with existing City regulations, the Project would implement appropriate temporary security features during construction (such as

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
• Coordinate with emergency response agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for emergency response services and that any required additional construction of buildings is incorporated in to the project description. • Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements, as appropriate and applicable, to mitigate identified CEQA impacts. • Project sponsors can and should develop traffic control plans for individual projects. Traffic control plans should include information on lane closures and the anticipated flow of traffic during the construction period. The basic objective of each traffic control plan (TCP) is to permit the contractor to work within the public right of way efficiently and effectively while maintaining a safe, uniform flow of traffic. The construction work and the public traveling through the work zone in vehicles, bicycles or as pedestrians must be given equal consideration when developing a traffic control plan.	installing chain link fencing and security lighting around the Project Site). Further, during operation, the Project would provide perimeter lighting to provide increased visibility and security, parking access control, and residential units access control. These measures would provide defensible spaces designed to reduce opportunity crime and ensure safety and security. Therefore, the Project is not anticipated to generate a demand for additional police protection services that could exceed the Los Angeles Police Department's (LAPD) capability to serve the Project Site. As such, the Project would not require the addition of a new police facility or the expansion, consolidation, or relocation of an existing police station to maintain service ratios. Thus, application of this mitigation measure to the Project is not required.
PMM PSS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.	Compliance with SCAG mitigation as an Applicable Incorporated Comparable City Condition. The City has determined that this mitigation measure does not apply to the Project, because the Project would be required to comply with similar existing regulations that are equal to or more effective than PMM PSS-1. The Project Applicant would be required to pay developer fees to the local school district as required by law and which considered full and complete mitigation, pursuant to Senate Bill (SB) 50 and California Government Code Section 65995. Thus, application of this mitigation measure to the Project is not required.
PMM PSL-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to	No mitigation applies. The Project Site is located in an urbanized area of the City that is already served by several existing libraries. While the Project's residential population could

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
reduce substantial adverse effects of construction of new or altered library facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as appropriate and applicable, to mitigate identified CEQA impacts.	result in an increased demand for library services, the Project would not create the need for new or altered library facilities. Thus, incorporation of this mitigation measure is not required.
RECREATION	
PMM REC-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies. b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as: i. Increasing the accessibility to natural areas for outdoor recreation ii. Utilizing “green” development techniques iii. Promoting water-efficient land use and development iv. Encouraging multiple uses, such as the joint use of schools	Compliance with SCAG mitigation as an Applicable Incorporated Comparable City Condition. Several existing parks are located in the Project Site area. Additionally, the Project includes open space and recreational facilities in accordance with the LAMC. Further, in accordance with Ordinance 184,505, the Applicant shall be required to pay a fee for the purpose of developing park and recreational facilities to mitigate the Project's demand for parks and recreational facilities. Through compliance with City requirements, the provision of Code required common open space and additional non required publicly accessible open space, the Project would not cause the need for new or altered parks and recreational services, the construction of which could result in significant environmental impacts. Thus, incorporation of this mitigation measure is not required.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
v. Including trail systems and trail segments in General Plan recreation standards.	
TRANSPORTATION	
PMM TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local agencies should incorporate strategies identified in the Federal Highway Administration's publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region's roadways: -- include TDM mitigation requirements for new developments; -- incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks; -- provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing; -- implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools; -- develop TDM-specific performance measures to evaluate project-specific and system-wide performance;	Compliance with SCAG mitigation applies. The City, as lead agency, has determined that this mitigation measure shall be incorporated into the Project and shall be tailored to specifically address Project-specific impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its Transportation Assessment Guidelines (TAG) in July 2019. Threshold T-2.1 (Causing Substantial Vehicle Miles Traveled) of the Transportation Assessment Guidelines states that a residential project would result in a significant VMT impact if it would generate household VMT per capita more than 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which it is located. The Project is in the North Valley APC sub - area which limits daily household VMT per capita to a threshold value of 9.2 and a daily work VMT per employee threshold value of 15.0 (15% below the existing VMT for the North Valley APC). The Project's household VMT was estimated to be 10.7 per capita for the 200 apartments prior to implementing TDM strategies which is above the North Valley APC threshold value. The commercial portion of the Project was estimated to generate 4.9 work VMT per employee which is below the North Valley APC threshold value. The Project household VMT exceeds the North Valley APC threshold, therefore the Project does have a significant impact on household VMT per capita in the North Valley APC prior to implementing TDM mitigation. With the recommended TDM measures listed below, however, the Project will have a household VMT value of 9.2 per capita and will fully mitigate the VMT household impact.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
-- incorporate TDM performance measures in the decision-making process for identifying transportation investments; -- implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and -- set aside funding for TDM initiatives. -- The increase in per capita VMT on facilities experiencing LOS F represents a significant impact compared to existing conditions. To assess whether implementation of these specific mitigation strategies would result in measurable traffic congestion reductions, implementing actions may need to be further refined within the overall parameters of the proposed Plan and matched to local conditions in any subsequent project-level environmental analysis.	Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Mitigation Measure MM-TRAN-1 Transportation Demand Management (TDM) Program • Unbundle Parking - This strategy unbundles the parking costs from the property costs, requiring those who wish to purchase parking spaces to do so at an additional cost from the property cost. The strategy assumes the parking cost is set by the VMT calculator to be a minimum of \$114 per month and paid by the vehicle owners/drivers. Unbundled parking and monthly fees would be part of the leasing and operation plans for the Project. The Project proposed to unbundle parking. • Bike Parking - This strategy involves implementation of short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations under existing LAMC regulations applicable to the Project (LAMC Section 12.21.A.16). The Project provides bicycle parking consistent with LAMC Section 12.21.A.16 - The Project will provide the required 17 short term and 129 long term bike parking spaces for a total of 146 bike parking spaces.
PMM TRA-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad	Compliance with SCAG mitigation applies. The City, as lead agency, has determined that this mitigation measure shall be incorporated into the Project through compliance with LADOT requirements and shall be tailored to specifically address Project-specific impacts. The Project would be required to comply with similar regulations that are equal to or more effective than PMM TRA-2. All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department, Bureau of

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements: -- Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. -- Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. -- Scheduling of truck trips outside of peak morning and evening commute hours. -- Limiting of lane closures during peak hours to the extent possible. -- Usage of haul routes minimizing truck traffic on local roadways to the extent possible. -- Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. -- Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. -- Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of	Engineering, and LAFD standards and requirements for design and construction. Also, prior to issuance of a building permit, the Project Applicant would be required to submit parking and driveway plans to the Bureau of Engineering, LAFD, and LADOT for approval to ensure that the Project complies with code-required emergency access and would not impair an adopted emergency response plan or emergency evacuation plan. Thus, application of this mitigation measure to the Project is not required. LADOT generally considers construction-related traffic to cause adverse but not significant impacts because, while sometimes inconvenient, construction-related traffic effects are temporary. LADOT requires implementation of worksite traffic control plans to ensure that any construction-related effects are minimized to the greatest extent possible. To be conservative, a Construction Traffic Management Plan (CTMP) will be implemented (see MM-TRAN-2). Temporary impacts to pedestrian safety could occur during construction. Safety measures will be implemented (see MM-TRAN-3) to ensure the safety of pedestrians and other vehicles in general, as the construction area could create hazards of incompatible/slow-moving construction and haul vehicles. Therefore, impacts would be less than significant. Mitigation Measures MM-TRAN-2 Prior to the start of construction, a Construction Traffic Management Plan (CTMP) shall be submitted to LADOT for review and approval. The CTMP will include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicycles, and pedestrians. The CTMP will include, but not limited to, the following measures:

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
the timing, location, and duration of construction activities and the locations of detours and lane closures. -- Storage of construction materials only in designated areas. -- Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. -- Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. -- Enhance emergency preparedness awareness among public agencies and with the public at large.	• Maintaining access for land uses in the vicinity of the Project Site during construction. • Schedule construction materials deliveries during off-peak periods to the extent practical. • Organize deliveries and staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to surrounding roadways. • Coordinate deliveries to ensure trucks do not wait to unload or load and impact surrounding roadways, and if needed, utilize an off-site staging area. • Control truck and vehicle access to the Project Site with flagmen. • Limit sidewalk and lane closures to the maximum extent possible, and avoid peak period hours to the extent possible. Where such closures are necessary, the Worksite Traffic Control Plan will identify the location of any sidewalk or lane closures and identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity • Parking for construction workers will be provided either on-site or at off-site, off-street locations. TRAN-MM-3 Safety Hazards • The developer shall install appropriate construction related traffic signs around the site to ensure pedestrian and vehicle safety. • Construction and construction staging shall be planned as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
	separation (including utilization of barriers such as K-Rails or scaffolding) from work space and vehicular traffic, and overhead protection, due to sidewalk closure or blockage, at all times. • Temporary pedestrian facilities shall be adjacent to the Project Site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility. • Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects. • Sidewalk shall be kept open during construction until only when it is absolutely required to close or block sidewalk for construction and/or construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.
TRIBAL CULTURAL RESOURCES	
<i>Impact TCR-1 Cause a substantial adverse change in the significance of a tribal cultural resource defined in Public Resources Code section 21074 that is:</i> a) <i>Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or</i> b) <i>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</i> See PMM CULT-1 above. PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to	No mitigation applies. AB 52 tribal consultation is not required for a SCEA. The City has determined that this mitigation measure does not need to be incorporated into the Project, because the City developed a Condition of Approval, which is equal to or more effective than PMM TRC-1. Thus, application of this mitigation measure to the Project is not required. The City developed the following standard condition of approval to ensure that if any tribal cultural resources are found during construction of the Project, they will be handled in compliance with state law so that any potential impacts would be less than significant. Condition of Approval In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling,

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
reduce substantial adverse effects on tribal cultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria; b) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource; c) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource.	tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity), 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 Applicant shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 978-1290. • If the City determines, pursuant to PRC Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 30 days, to conduct a site visit and make recommendations to the Applicant 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 Applicant shall implement the tribe's recommendations if a qualified archaeologist and by a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible. • The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
	recommence ground disturbance activities until this plan is approved by the City. • If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation. • The Applicant 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 by a culturally affiliated tribal monitor and determined to be reasonable and appropriate. • Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton. Inadvertent discovery of Human Remains In the event that human skeletal remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
	ground disturbance activities, the following procedures shall be followed: • Stop immediately and contact the County Coroner: 1104 N. Mission Road Los Angeles, CA 90033 (323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday), or (323) 343-0714 (after hours, Saturday, Sunday, and holidays) • If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the NAHC. • The NAHC will immediately notify the person it believes to be the most likely descendant (MLD) of the deceased Native American. • The MLD has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. • If the Applicant does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC. • In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements. Based on these conditions, any potential impacts would be less than significant.
UTILITIES AND SERVICE SYSTEMS	
PMM USSW-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:	No mitigation applies. The City, as lead agency, has determined that the Project would be in compliance with this mitigation, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM USSW-2. Specifically, at the State level, the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939) seeks to improve solid

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
Integrate green building measures with CALGreen (California Building Code Title 24) into project design, including but not limited to the following: a) Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. b) Inclusion of a waste management plan that promotes maximum C&D diversion. c) Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.). d) Reuse of existing structure and shell in renovation projects. e) Development of indoor recycling program and space. f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities. g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and Connect SoCal policies can and should be required. h) Encourage waste reduction goals and practices and look for opportunities for	waste disposal management with respect to (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal. AB 939 mandates jurisdictions to meet a diversion goal of 25 percent by 1995 and 50 percent by 2000. Pursuant to AB 939, each County is required to prepare and administer a Countywide Integrated Waste Management Plan (ColWMP), pursuant to which landfill disposal needs and capacity are continually evaluated as part of the preparation of the ColWMP Annual Report that examines future landfill disposal needs over the next 15-year planning horizon. The most recent ColWMP (the 2020 Annual Report for Los Angeles County) states that no solid waste disposal capacity shortfall is anticipated within the next 15 years under current conditions.⁸ The CiSWMPP is a long-range policy plan adopted in 1993 to provide direction for the solid waste management. The objective of the CiSWMPP is to promote source reduction or recycling for a minimum of 50 percent of the City's waste by 2000, or as soon as possible thereafter, and 70 percent of the waste by 2020. The Plan's goal has also been surpassed by the City, which achieved a diversion rate of 76.4 percent in 2012.⁹ The City also adopted the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) in 2006, which has the primary objective of achieving a zero waste goal through reducing, reusing, recycling, or converting the resources currently going to disposal. The Project would be required to reduce the total estimated waste output through established City recycling programs, and would also be subject to the City's Recycling Space Allocation Ordinance (Ordinance No. 171,687), which establishes requirements for the inclusion of recycling areas or rooms within development projects.

⁸ County of Los Angeles Department of Public Works, ColWMP 2020 Annual Report, October 2021.

⁹ LASAN, Recycling, 2022, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=auguwwldg_5&_afLoop=10870014375826670#!, accessed June 2022.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
voluntary actions to exceed the 80 percent waste diversion target. i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices. j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities. k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts. l) Integrate reuse and recycling into residential industrial, institutional and commercial projects. m) Provide education and publicity about reducing waste and available recycling services. n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.	In addition, in compliance with existing City standards and regulations, the Project would be required to recycle construction and demolition (C&D) waste to the maximum extent possible pursuant to Ordinance No. 181,519 (Citywide Construction and Demolition Waste Recycling Ordinance) that requires all mixed C&D waste generated within City limits to be taken to City-certified C&D waste processors. Compliance with these regulations would ensure that construction waste is recycled and disposed of properly. Overall, compliance with existing regulations would ensure that the Project's waste disposal needs are reduced and can be sufficiently met by local landfills, thereby achieving consistency with this mitigation measure. Project construction waste would be hauled by permitted haulers and taken only to City-certified C&D processing facilities that are monitored for compliance with existing regulations. Project-generated C&D waste would represent a very small portion of the waste disposal capacity in the region. In addition, waste generated by the Project would be subject to State and local recycling and waste diversion strategies and policies including the City's Zero Waste Plan goal of achieving a 90 percent solid waste diversion rate by 2025. Thus, application of this mitigation measure to the Project is not required.
PMM USWW-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. There CEQA determinations must ensure that the proposed development can be	No mitigation applies. The analysis of the Project's potential impacts related to wastewater treatment in Section 5 (Sustainable Communities Environmental Analysis) concluded that the Project's estimated wastewater generation of approximately 36,730 gallons per day could be accommodated by the existing remaining daily treatment capacity of the Hyperion Treatment Plant. Additionally, the Project would be required to comply with the Los Angeles County Department of Public Works Hydrology Manual for designing and hydrology and drainage infrastructure. The Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm even and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.	storm event. The Project would be required by the City to control stormwater runoff from the Project Site to meet these requirements. The Bureau of Sanitation estimated the wastewater discharge from the Project and analyzed the sewer availability around the Site. The sewer infrastructure in the vicinity of the proposed project includes an existing 8-inch line on Titus Street. The sewage from the existing 8-inch line feeds into a 15-inch line on Van Nuys Boulevard before discharging into a 27-inch sewer line on Sherman Way. Based on estimated flows, it appears the sewer system might be able to accommodate the total flow for the Project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer lacks sufficient capacity, then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at the time. Ultimately, this sewage flow will be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the Project.¹⁰ The Project would not require or result in the relocation or construction of new or expanded wastewater treatment or storm drainage facilities, the construction or relocation of which could cause significant environmental effects. No significant impacts related to these issues have been identified, and no mitigation measures are required. Thus, incorporation of this mitigation measure is not required.
PMM USWS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Reduce exterior consumptive uses of water in public areas, and should promote	No mitigation applies. The Project would connect to the existing water conveyance infrastructure near the Project Site. According to Los Angeles Department of Water and Power's (LADWP) 2020 Urban Water Management Plan (2020 UWMP), the City has sufficient water supply to meet a total projected water demand through to the year 2045, in a Normal Wet Year, a Single Dry Year, and Multiple Dry Years. The 2020 UWMP also includes a

¹⁰ Wastewater Response, Bureau of Sanitation, July 17, 2020.

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives b) Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible. c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair. d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite.	drought risk assessment, which shows that there would be no water shortages over the five-year drought, which started in 2021 (2020 UWMP, page 11-13). As such, the City can provide the needed water from its existing system pursuant of the provisions in 2020 UWMP. Additionally, the Project Applicant would be required to comply with the water efficiency standards outlined in CalGreen, City Ordinance No. 180822¹¹ and in the LAGBC¹² to minimize water usage. Further, prior to issuance of a building permit, the Project Applicant would be required to consult with LADWP to determine Project-specific water supply service needs and all water conservation measures that shall be incorporated into the Project. Therefore, the City would not require new water infrastructure or supply to meet the demand from the Project. Thus, application of this mitigation measure to the Project is not required.
WILDFIRE	
PMM WF-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire ignition. b) Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances	No mitigation applies. The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Thus, incorporation of this mitigation measure is not required.

¹¹ <http://clkrep.lacity.org/online/docs/2009/09-0510ord180822.pdf>

¹² <http://www.ladbs.org/forms-publications/forms/green-building>

Table 4-1
Applicability of 2020-2045 RTP/SCS Final EIR Mitigation Measures

Mitigation Measure	Applicability to the Project
the structure will survive a wildfire and also allow for people to shelter-in-place. c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary. d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses. e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures. f) Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place.	
PMM WF-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to: -- Submit a fire protection plan including the designation of fire watch staff; -- Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities; -- Locate construction and maintenance equipment in designated “safe areas” such that they do not discharge combustible materials; and -- Designate trained fire watch staff during project construction to reduce risk of fire hazards.	No mitigation applies. The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Thus, incorporation of this mitigation measure is not required.
<i>Source: SCAG, 2020-2045 RTP/SCS Final EIR, Mitigation Monitoring and Reporting Program, adopted May 2020.</i>	

5 Environmental Impact Analysis

This section of the SCEA contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines, (C.C.R. Title 14, Chapter 3, 15000-15387).

Pursuant to PRC Section §21155.2(b), the SCEA is required to identify all significant or potentially significant impacts of the Transit Priority Project, other than those which do not need to be reviewed pursuant to Section 21159.28 based on substantial evidence in light of the whole record. The SCEA is required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports.

In 2006, the City published the L.A. CEQA Thresholds Guide (Thresholds Guide) as a guidance document for preparing CEQA analyses for projects within the City. The Thresholds Guide includes two sets of criteria to evaluate project impacts: screening criteria, which provide directions in determining the appropriate environmental document required for a project; and significance thresholds, which assist in determining whether a project's impacts generally would be significant under normal circumstances and would therefore require mitigation. Although intended as a voluntary tool, the Thresholds Guide offers a consistent set of evaluation criteria applicable to most discretionary projects in the City, and the Los Angeles Department of City Planning (DCP) has typically used both the screening criteria and significance thresholds as a basis for project analyses in its CEQA documents.

However, the Thresholds Guide clearly indicates the Lead Agency – in this case, the DCP – retains the authority to determine significance thresholds on a case-by-case basis, dependent upon unique environments, evolving regulatory requirements, and the nature of each project. The Thresholds Guide also states it is not intended as substitute for the use of independent judgment to determine significance or the evaluation of the evidence in the record. Moreover, it states “because evaluation practices continue to evolve due to changing regulations, scientific methods, and court decisions, the project evaluator and lead City agency should always use the best information and evaluation methods available, including those from sources other than the Thresholds Guide.

In light of an evolving regulatory environment, recent case, law, new topics such as greenhouse gas emissions and tribal cultural resources that are now addressed in Appendix G of the State CEQA Guidelines (Appendix G), and the age of the Thresholds Guide, the DCP has begun to update its CEQA guidance. At this point in time, the DCP has chosen to rely on the Appendix G questions as thresholds of significance. As noted above, the City has discretion in choosing appropriate significance thresholds. Therefore, throughout this SCEA, the thresholds contained in Appendix G are used. The factors and considerations set forth in the Thresholds Guide are utilized where appropriate to assist in answering the Appendix G threshold questions. Additionally, in January 2018, OPR published comprehensive updates to the CEQA Guidelines which revised thresholds for aesthetics, air quality, cultural resources, geology and soils, hydrology and water quality, land use and planning, noise, population and housing, transportation, and utilities and service systems. The update also added energy and wildfire questions to Appendix G. The updated CEQA Guidelines became effective on December 28, 2018 and are reflected throughout

this SCEA. With respect to traffic/transportation impacts, recent changes have been implemented to Section 15064.3 of the State CEQA Guidelines, in which vehicle miles traveled (VMT) as the criteria by which to determine transportation impacts under CEQA, compared to the previous Level of Service (LOS) methodology. CEQA Guidelines Section 15064.3(c) state the provisions of Section 15064.3 shall apply statewide beginning on January 1, 2020 but that a lead agency may elect to be governed by its provisions immediately upon adoption. On July 30, 2019, the City adopted the VMT threshold and methodology. Therefore, in response to this action, the Transportation Section of this SCEA is based on the current Appendix G CEQA Thresholds and appropriately incorporates the VMT analysis for the Project.

1 Aesthetics

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

Senate Bill 743 – Environmental Quality: Transit Oriented Infill Projects

Senate Bill (SB) 743 [Public Resources Code (PRC) Section 21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) 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.”

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 “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 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 ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that “visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or

any other aesthetic impact as defined in the L.A. CEQA Threshold Guide (2006) shall not be considered an impact for infill projects within TPAs pursuant to CEQA."¹

The Project is a mixed-use development containing residential and commercial uses on an infill site within a TPA. Therefore, PRC Section 21099(d) applies to the Project and the Project is exempt from aesthetic impacts.

The analysis is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this initial study shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

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

No Impact.

Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance); and focal views (visual access to a particular object, scene, or feature of interest).

The Project Site is located within a high-density urban area and part of the Project Site is currently developed with the Existing Building. The Project Site is surrounded by commercial uses to the north, west, and south and a street to the east. The Project Site does not possess any unique aesthetic characteristics.

At the street-level, views are limited predominately to those from the north-south oriented streets, such as Van Nuys, and east-west oriented streets, such as Titus. However, there is nothing unique about these street views that would qualify as scenic vistas. Views in the vicinity of the Project Site are largely constrained by the existing structure on the Project Site and structures on adjacent parcels.

Minimal scenic or natural setting views are visible due to the urban uses. In addition, CEQA is only concerned with public views with broad access by persons in general, not private views that will affect particular persons.² Urban features that may contribute to a valued aesthetic character or image include: structures of architectural or historic significance or visual prominence; public plazas, art or gardens; heritage oaks or other trees or plants protected by the City; consistent design elements (such as setbacks, massing, height, and signage) along a street or district; pedestrian amenities; landscaped medians or park areas; etc. There are no tall features on the Project Site from which scenic vistas may be obtained or which make up part of the scenic landscape of the surrounding community.

1 City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA. Available at: <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>, accessed August 22, 2022.

2 Obstruction of a few private views in a project's immediate vicinity is not generally regarded as a significant environmental impact. (See *Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist.*, supra, 116 Cal.App.4th at p. 402 [that a project affects "only a few private views" suggests that its impact is insignificant]; *Mira Mar Mobile Community v. City of Oceanside*, supra, 119 Cal.App.4th at pp. 492-493 [distinguishing public and private views; "[u]nder CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons"].

The Project would improve the Project Site with a new 7-story, mixed-use building with ground floor commercial space and a separate Parking Building. Due to the relatively level topography and extent of development within the immediate area, there are no scenic views or vantage points that afford scenic views. Therefore, no significant impact to any recognized or valued scenic view would occur.

The Project meets all criteria specified in Section 21099 of the PRC. No designated scenic vistas in the local area would be impeded, and the Project will not substantially block any scenic vistas. Therefore, no impact would occur.

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

No Impact.

The Project Site is not located within or along a designated scenic highway, corridor, or parkway. The closest officially designated state scenic highway is approximately 15 miles east of the Project Site (State Route 2, from 3 miles north of I-210 in La Canada to the San Bernardino County Line).³ The nearest City of Los Angeles designated scenic highway is Sepulveda Boulevard, from Rayen Street to Devonshire Street, approximately 1.3 miles northwest of the Project Site.⁴

According to ZIMAS, the Project Site does not require historic preservation review.⁵

There are no identified scenic resources such as rock outcroppings located on-site.

There are 141 trees on the Project Site, none of which are classified as a protected species.⁶

The Project is not located along or within the scenic vistas or viewsheds of this highway. The Project would not damage and/or remove any scenic resources within a State or City designated scenic highway. Therefore, no impact would occur.

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

No Impact.

The Project Site is located within an urbanized area which is characterized by commercial uses and residential neighborhoods with a mix of older structures and newer architecture.

3 Caltrans State Scenic Highways Map: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacc>, accessed August 22, 2022.

4 Mobility Plan 2035: <https://planning.lacity.org/plans-policies/initiatives-policies/mobility>, accessed August 22, 2022.

5 HistoricPlacesLA: <http://www.historicplacesla.org/map>, accessed August 22, 2022.

6 [Tree Report](#), The Tree Resource, May 21, 2020.

The building heights and massing from the implementation of the Project would create a change in the visual character of the Project Site from what currently exists. However, it would be similar in height and massing to other buildings in the area, including:

- 14-story residential building (8155 Van Nuys) on the Site.
- 7-story office building (8121 Van Nuys) directly south of the Site.
- 6-story office building (14500 Roscoe Boulevard) 450 feet north of the Site.
- 4-story school building (8015 Van Nuys) 400 feet south of the Site.

The buildings surrounding the Project Site vary in age and architectural style. The Project's design is a contemporary style that would complement the Existing Building on the Site. The design would include architectural features such as sidewalk trees, articulated facades, and varying building materials. As a result of the building's architectural design, the Project would be effectively integrated into the aesthetic of the area by means of design, size, massing, and location.

The Project is compatible with existing and future development on adjacent and neighboring properties. The Project enhances the pedestrian orientation of Panorama City through landscaped buffers, new street trees, and a new residential building with minimal setback from Van Nuys Boulevard. The new building will not have a parking podium, but instead will have ground floor retail that will activate the street.

The new parking building will be situated on the western edge of the project site, far away from Van Nuys Boulevard, on the portion of the site that is zoned for industrial uses. Access to the parking building will be off of Titus Street. The parking building includes a distinctive and architecturally varied top level that will provide warehousing.

The existing and two new buildings will be compatible with the height and scale of existing buildings in this part of Panorama City, which is characterized by a variety of low- to mid-rise buildings. The new seven-story residential building is mid-rise, at 97 feet in height. The new parking and warehouse building is low-rise, with four levels and a height of 57 feet. As such, both buildings fit in well with the existing urban landscape.

As a center for Regional Commercial, this area would thus include corporate professional offices, concentrations of entertainment and cultural facilities, and mixed-use developments. When fully built out, the project site will constitute a major unified and mixed-use development that is entirely consistent with the General Plan's vision for this part of Los Angeles. As such, it will be compatible with existing and future development in the immediate area.

The Project's landscape plan and unobtrusive approach to privacy fencing and walls means that the site, when viewed from the adjoining public right-of-way, will be visually appealing and architecturally integrated into the existing built environment.

During construction, construction walls and barriers would be erected to protect the Site from vandalism and, which have the potential to attract unauthorized bills and postings. The Project

will comply with LAMC Section 14.4.17, which regulates temporary signage on construction barriers.

During operation, the Project would be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to LAMC Section 91.8104.

The Panorama City Community Design Overlay (CDO) provides guidelines and standards for all public and private development projects in Panorama City. The intent of the CDO is to provide guidance and direction in the design of buildings and storefronts that will contribute to the district's continuing revival by moving toward a more pedestrian friendly commercial center that contributes to community identity. All new development projects within the CDO are reviewed for conformance with the CDO guidelines, which address the following areas: site planning (building setback, pedestrian entrance, parking, consistency of materials, landscaping freestanding walls, accessibility, and automobile ingress/egress) and architecture/building composition (windows and door openings, roof lines, color, lighting, mechanical equipment screening, exterior building materials, signs, architecture/storefront design, and storefront windows). The Project complies with the CDO, as demonstrated in the Land Use and Planning section below.

Based on the above, the Project would not conflict with applicable zoning and other regulations governing scenic quality.

The Project Site will be landscaped, and include a total of 100 shade trees. The large outdoor pool will be surrounded by a deck, and include a small restroom building. A long pedestrian walkway will bisect the lot, starting from the parking and warehouse building and connecting the site to Van Nuys Boulevard. All of these recreational amenities and open space will be made available for the common use and enjoyment of tenants of both the new and existing buildings, thus substantially improving the habitability of the entire unified development. The design overlay and landscape plans, appealing project architecture, plus the provision of unobtrusive privacy fencing and walls, will all serve to minimize project impacts on neighboring properties.

Overall, while the Project would change the visual character of the Project Site, the height of the proposed building, design, massing, and scale would be compatible with the existing urban uses that set the aesthetic character of the vicinity. Based on the analysis above, the Project would not substantially degrade the existing visual character or quality of the Project Site or surrounding vicinity. Therefore, no impact would occur.

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

No Impact.

Light

The Project is located in a well-lit mixed-use area of the City where there are moderate to high levels of ambient nighttime lighting, including street lighting, vehicle headlights, architectural and security lighting, and indoor building illumination (light emanating from structures which passes through windows), all of which are common to densely populated areas. Artificial light impacts are largely a function of proximity.

The Project Site is located within a mixed-use environment, so that light emanating from any one source contributes to lighting impacts rather than being solely responsible for lighting impacts on a particular use. As uses surrounding the Project Site are already impacted by lighting from existing development within the area, the amount of new light sources must be highly visible from light-sensitive uses to have any notable effect.

Per LAMC Section 41.40, construction activities are prohibited between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, and between 6:00 p.m. and 8:00 a.m. on Saturday. Construction activities are prohibited on Sundays and all federal holidays. Therefore, construction would occur primarily during daylight hours, and construction lighting would only be used for the duration needed if construction were to occur during evening hours.

During operations, the Project's mix of uses would generate levels of interior and exterior lighting for security, parking entrances, signage and architectural highlighting, similar to other uses in the area. Soft accent lighting used for signage, and architectural highlighting would be directed to permit visibility of the highlighted elements but would not be so bright as to cause substantial light spill off the Project Site.

Outdoor lighting would be designed and installed with shielding, such that lighting would be directed and focused on the Project Site and not on adjacent residential properties in accordance with LAMC lighting regulations which require that operational lighting will be directed downward or on the specific on-site feature to be lit or avoid direct glare onto exterior glazed windows or glass doors of existing and adjacent uses. Proposed signage and outdoor lighting would be subject to applicable regulations contained within the LAMC.

LAMC Section 93.0117(b) limits lighting intensity or direct glare onto exterior glazed windows or glass doors on any property containing residential units; elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units.

LAMC Section 14.4.4.E, requires that no sign shall be arranged and illuminated in a manner that would produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

The Project will not result in a new source of substantial light. Therefore, no impact would occur.

Glare

Urban glare is largely a daytime phenomenon occurring when sunlight is reflected off the surfaces of buildings or objects. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. Potential reflective surfaces in the project vicinity include automobiles traveling and parked on streets in the vicinity of the Project Site, exterior building windows, and surfaces of brightly painted buildings in the project vicinity. Glare from building facades include those that are largely or entirely comprised of highly reflective glass or mirror-like material from which the sun reflects at a low angle in the periods following sunrise and prior to sunset.

The Project includes an increase in window and building surfaces in comparison to the existing uses. This increase in surfaces will have the potential to reflect light onto adjacent roadways and

land uses. However, the Project will limit reflective surface areas and the reflectivity of architectural materials used. The Project will not be an all-glass façade but instead will have facades that are broken up by the various articulation. Glass that will be incorporated into the facades of the building will either be of low-reflectivity or accompanied by a non-glare coating as required by the Los Angeles Building Code. The Project will not result in a new source of substantial glare. Therefore, no impact would occur.

Cumulative Impacts

Less Than Significant Impact.

Development of the Project in conjunction with related projects would result in an incremental intensification of land uses in a heavily urbanized area of the City of Los Angeles. Because of the area's dense urban fabric, public scenic views are generally available only through public street corridors and from public parks that have street corridor views or are set back from existing buildings. Related projects in combination with the Project are located within designated urban lots planned for development and would not encroach upon public views through street corridors. Although some views of architecturally or historically important buildings could be obscured by taller buildings constructed within a line of sight over existing low rise development and parking lots, there would be limited potential for such occurrences and views of primary facades of architecturally or historically important buildings would not likely be affected.

In addition, most development of a larger scale would be subject to environmental review and indirect impacts on historic resources or other scenic resources would be mitigated to the degree feasible. Accordingly, as the Project would not have direct or indirect impacts on scenic resources, its contribution to impacts on views of scenic resources from other related projects would not be cumulatively considerable and cumulative impacts would be less than significant.

Because the visual character of the area is defined by a range of diverse architecture that is generally not cohesive, and in many areas, like the Project Site, lacks a high level of visual quality, it is anticipated that new development would in general upgrade the visual quality of the area. New development subject to discretionary approval would conform to the City's design standards, and it is therefore anticipated that new development would reflect high quality design and would not degrade the visual character of the area. Accordingly, as the related projects and the Project would not degrade the visual character of the Project area, the Project's contribution to adverse impacts on visual character would not be cumulatively considerable and cumulative impacts would be less than significant.

Cumulative light and glare effects would be consistent with the existing urban environment, which is characterized by high ambient light levels. Because lighting, including illuminated signage and outdoor lighting would be subject to regulations contained within the LAMC, compliance would ensure that impacts regarding lighting for the Project and related projects would not significantly impact sensitive uses. Accordingly, the Project's contribution to light and glare impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

II. Agriculture and Forestry Resources

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:					
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d.	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

- a) **Would the project convert prime farmland, unique farmland, or farmland of statewide importance (farmland), as shown on the maps prepared pursuant to the farmland mapping and monitoring program of the California resources agency, to non-agricultural use?**

No Impact.

A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland" in California. The Project Site is zoned C2 and M1, and the General Plan land use designation for the Site is Regional Commercial and Limited Industrial. The Site is developed with a buildings and parking lot. The Site is designated Urban and Built-up Land and is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.⁷ Therefore, no impact would occur.

⁷ State of California Department of Conservation, California Important Farmland Finder: <https://maps.conservation.ca.gov/DLRP/CIFF/>, accessed August 22, 2022.

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

No Impact.

A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act Contract from agricultural use to non-agricultural use. The Williamson Act of 1965 allows local governments to enter into agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.⁸ The Project Site will not result in the conversion of land zoned for agricultural use to non-agricultural use. Further, the Project will not result in the conversion of land under a Williamson Act Contract from agricultural use to non-agricultural use because the Site is not subject to a Williamson Act contract. Therefore, no impact would occur.

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

No Impact.

Neither the Project Site nor surrounding parcels are zoned for forest land or timberland. Therefore, no impact would occur.

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

No Impact.

The Project Site is completely surrounded by urban uses and infrastructure, and is not forest land. Therefore, no impact would occur.

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

No Impact.

A significant impact may occur if a project involves changes to the existing environment that could result in the conversion of farmland to another non-agricultural use or conversion of forest land to non-forest use. The Project Site is in an area of the City that is highly urbanized. Neither the Project Site nor surrounding parcels are utilized for agricultural uses or forest land and such uses are not in proximity to the Project Site. Therefore, no impact would occur.

Cumulative Impacts

⁸ State of California Department of Conservation, Division of Land Resource Protection, The Williamson Act Status Report 2020-21, available at https://www.conservation.ca.gov/dlrp/wa/Pages/stats_reports.aspx, accessed August 22, 2022.

No Impact.

As with the Project, the related projects are located within a developed, urbanized area of the City of Los Angeles generally zoned for commercial and residential uses and their project sites do not support existing farming, agricultural or forest-related operations. Therefore, development of the related projects together with the Project would not result in the conversion of State-designated agricultural land from an agricultural use to a non-agricultural use, or result in the loss of forest land or the conversion of forest land to non-forest use.

III. AIR QUALITY

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:					
a.	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c.	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d.	Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	☐	☐	☒	☐

This section of the Mitigated Negative Declaration addresses the air emissions generated by construction and operation of the Project. The analysis also evaluates the consistency of the Project with the air quality policies set forth within the South Coast Air Quality Management District's (SCQMD) Air Quality Management Plan (AQMP) and the City of Los Angeles (City) General Plan. The analysis of Project-generated air emissions focuses on whether the Project would cause an exceedance of an ambient air quality standard or SCAQMD significance threshold. Calculation worksheets, assumptions, and model outputs used in the analysis are included in **Appendix B** to this SCEA:

B Air Quality and Greenhouse Gas Emissions Technical Modeling, NTEC, July 2020.

Regulatory Framework

Federal

Clean Air Act

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years, with the most recent amendments occurring in 1990. At the federal level, the United States Environmental Protection Agency (USEPA) is responsible for implementing some portions of the CAA (e.g., certain mobile source and other requirements). Other portions of the CAA (e.g., stationary source requirements) are implemented by state and local agencies. In California the California Clean Air Act (CCAA) is administered by the California Air Resources Board (CARB) at the state level and by the air quality management districts and air pollution control districts at the regional and local levels.

The CAA governs the establishment, review, and revision, as appropriate, of the National Ambient Air Quality Standards (NAAQS), which provide protection for the nation's public health and the environment. NAAQS are based on quantitative characterizations of exposures and associated risks to human health and the environment. The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a

demonstration of reasonable further progress towards attainment and the incorporation of additional sanctions for failure to attain or to meet interim milestones. NAAQS have been established for seven major air pollutants: carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), PM_{2.5} (particulate matter, 2.5 microns), PM₁₀ (particulate matter, 10 microns), sulfur dioxide (SO₂), and lead (Pb).

The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are shown in **Table 5.3-1**. USEPA has classified the Los Angeles County portion of the South Coast Air Basin (Basin) as a nonattainment area for O₃, PM_{2.5}, and lead.

**Table 5.3-1
State and Federal Ambient Air Quality Standards and Attainment for L.A. County**

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

	Calendar Quarter	-	-	0.15 µg/m ³	Non-attainment
Source: Maps of State and Federal Area Designations, https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations . Accessed August 22, 2022.					

State

California Clear Air Act

In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the CCAA. In California the CCAA is administered by CARB at the state level and by the air quality management districts and air pollution control districts at the regional and local levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for meeting the state requirements of the CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS. CAAQS are generally more stringent than their corresponding NAAQS and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CAAQS define clean air: they represent the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without any harmful effects on people or the environment.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the non-desert Los Angeles County portion of the Basin is designated as a nonattainment area for O₃, PM₁₀, and PM_{2.5}. The State standards and attainment/non-attainment are also shown in **Table 5.3-1**.

California Air Toxics Program

CARB's Air Toxics Program was established in 1983 in response to the adoption of AB 1807, the Toxic Air Contaminant Identification and Control Act. AB 1807 directs CARB and the State Office of Environmental Health Hazard Assessment (OEHHA) to identify toxic air contaminants (TACs) and determine whether any regulatory action is necessary to reduce their risks to public health. Substances formally identified as TACs include diesel particulate matter and environmental tobacco smoke.

Air Quality and Land Use Handbook: A Community Health Perspective

Released by CARB in 2005, the *Air Quality and Land Use Handbook: A Community Health Perspective* provides recommendations regarding the siting of new sensitive land uses near potential sources of TACs (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gas stations), as well as the siting of new TAC sources in

proximity to existing sensitive land uses.⁹ The recommendations are advisory and should not necessarily be interpreted as defined “buffer zones”; if a project or sensitive land uses are within the siting distance, CARB recommends further analysis.

Regional

South Coast Air Quality Management District

The Project is located within the 6,745-square-mile South Coast Air Basin (Basin). The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. It is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and the San Diego County line to the south. The South Coast Air Quality Management District (SCAQMD) is the agency principally responsible for air pollution control in the Basin. Specifically, SCAQMD is responsible for planning, implementing, and enforcing programs designed to attain and maintain CAAQS established by CARB and NAAQS established by the USEPA. All projects in the SCAQMD jurisdiction are subject to SCAQMD rules and regulations, including, but not limited to, the following:

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

2022 Air Quality Management Plan

SCAQMD adopted the 2022 Air Quality Management Plan (AQMP) on December 2, 2022, updating the region’s air quality attainment plan to address the “extreme” ozone non-attainment status for the Basin and the severe ozone non-attainment for the Coachella Valley Basin by laying a path for attainment by 2037. This includes reducing NOx emissions by 67 percent more than required by adopted rules and regulations in 2037. The AQMP calls on strengthening many stationary source controls and addressing new sources like wildfires, but still concludes that the region will not meet air quality standards without a significant shift to zero emission technologies and significant federal action. The 2022 AQMP relies on the growth assumptions in SCAG’s 2020-2045 RTP/SCS.

Southern California Association of Governments

⁹ CARB, Air Quality and Land Use Handbook, A Community Health Perspective, April 2005.

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties that is tasked with addressing regional issues relating to transportation, the economy, community development, and the environment. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain NAAQS. Additionally, SCAG is a co-producer, with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin's AQMP. The 2020-2045 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked, and that continued recognition of this close relationship will help the region make choices that sustain existing resources and expand efficiency, mobility, and accessibility for people across the region.

In particular, the 2020-2045 RTP/SCS draws a closer connection between where people live and work, and it offers a blueprint for how Southern California can grow more sustainably. To this end, the 2020-2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's High Quality Transit Areas (HQTAs). HQTAs are a cornerstone of land use planning best practice in the SCAG region, and studies by the California Department of Transportation, the USEPA, and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption.¹⁰

On September 3, 2020, SCAG's Regional Council adopted the 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS was determined to conform to the federally-mandated state implementation plan (SIP), for the attainment and maintenance of NAAQS standards. On October 30, 2020, CARB also accepted SCAG's determination that the SCS met the applicable state greenhouse gas emissions targets. The 2020-2045 RTP/SCS was incorporated into the 2022 AQMP.

The RTP/SCS addressed the continuing transportation and air quality challenges of adding 3.7 million additional residents, 1.6 additional households, and 1.6 million additional jobs between 2016 and 2045. The RTP/SCS calls for \$639 billion in transportation investments and reducing VMT by 19 percent per capita from 2005 to 2035. The RTP/SCS accommodates 21.3 percent regional growth in population from 2016 (3,933,800) to 2045 (4,771,300) and a 15.6 percent growth in jobs from 2016 (1,848,300) to 2045 (2,135,900). The regional plan projects several benefits:

- Decreasing drive-along work commutes by three percent
- Reducing per capita VMT by five percent and vehicle hours traveled per capita by nine percent
- Increasing transit commuting by two percent
- Reducing travel delay per capita by 26 percent
- Creating 264,500 new jobs annually

¹⁰ <https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020>

- Reducing greenfield development by 29 percent by focusing on smart growth
- Locating six more percent household growth in High Quality Transit Areas (HQTAs), which concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.
- Locating 15 percent more jobs in HQTAs
- Reducing PM_{2.5} emissions by 4.1 percent
- Reducing GHG emissions by 19 percent by 2035

Local

City of Los Angeles General Plan Air Quality Element

The City's General Plan Air Quality Element identifies policies and strategies for advancing the City's clean air goals. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and air quality goals. The Air Quality Element includes six key goals:

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

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

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

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

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

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

Pollutants and Effects

State and Federal Criteria Pollutants

Air quality is measured by the ambient air concentrations of seven pollutants that have been identified by the USEPA due to their potentially harmful effects on public health and the environment. These "criteria air pollutants" include carbon monoxide, ground-level ozone, nitrogen dioxide, sulfur dioxide, particulate matter ten microns or less in diameter, particulate matter 2.5 microns or less in diameter, and lead. The following descriptions of each criteria air

pollutant and their health effects are based on information provided by the USEPA and the SCAQMD.^{11,12}

Carbon Monoxide – CO CO is a colorless and odorless gas that is released when something is burned. Outdoors, the greatest sources of CO are cars, trucks, and other vehicles or machinery that burn fossil fuels. Unvented kerosene and gas space heaters, leaking chimneys and furnaces, and gas stoves can release CO and affect air quality indoors. Breathing air with elevated concentrations of CO reduces the amount of oxygen that can be transported via the blood stream and can lead to weakened heart contractions; as a result, CO inhalation can be particularly harmful to people with chronic heart disease. At moderate concentrations, CO inhalation can cause nausea, dizziness, and headaches. High concentrations of CO may be fatal; however, such conditions are not likely to occur outdoors.

Ozone – O₃ O₃ is a colorless gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) undergo slow photochemical reactions in the presence of ultraviolet sunlight. The greatest source of VOC and NO_x emissions is automobile exhaust. O₃ concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperatures are favorable to its formation. Elevated levels of O₃ irritate the lungs and airways and may cause throat and chest pain, as well as coughing, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to the scarring of lung tissue and reduced lung efficiency.

Nitrogen Dioxide – NO₂ NO₂ is primarily a byproduct of fossil fuel combustion and is therefore emitted by automobiles, power plants, and industrial facilities. The principal form of nitrogen oxide produced by fossil fuel combustion is nitric oxide (NO), which reacts quickly to form NO₂, creating the mixture of NO and NO₂ commonly called NO_x. NO₂ absorbs blue light and results in reduced visibility and a brownish-red cast to the atmosphere. NO₂ also contributes to the formation of PM₁₀. Nitrogen oxides irritate the nose and throat and increase susceptibility to respiratory infections, especially in people with asthma. Longer exposures to elevated concentrations of NO₂ may even contribute to the development of asthma. The principal concern of NO_x is as a precursor to the formation of ozone.

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

Particulate Matter (PM₁₀ and PM_{2.5}) The human body naturally prevents the entry of larger particles into itself. However, smaller particles less than 10 microns (PM₁₀) or even less than 2.5 microns (PM_{2.5}) in diameter can enter the body and become trapped in the nose, throat, and upper

11 USEPA, Criteria Air Pollutants, www.epa.gov/criteria-air-pollutants.

12 SCAQMD, Final 2012 Air Quality Management Plan, February 2013.

respiratory tract. Here, these particulates may aggravate existing heart and lung diseases, affect the body's defenses against inhaled materials, and damage lung tissue. Those most sensitive to PM₁₀ and PM_{2.5} include children, the elderly, and those with chronic lung and/or heart disease.

Lead – Pb Airborne lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting and other metal processing activities are the primary sources of lead emissions. The lead effects most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ.

Toxic Air Contaminants – TACs

TACs refer to a diverse group of “non-criteria” air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above, but because their effects tend to be local rather than regional. As discussed earlier, CARB and OEHHA determine if a substance should be formally identified, or “listed,” as a TAC in California. A complete list of these substances is maintained on CARB's website.¹³

One key TAC is diesel particulate matter (diesel PM), which is emitted in diesel engine exhaust. Released in May 2015 by the SCAQMD, the Multiple Air Toxics Exposure Study in the South Coast Air Basin Final Report (Mates IV) determined that about 90 percent of the carcinogenic risk from air toxics in the Basin is attributable to mobile source emissions. Of the three carcinogenic TACs that constitute the majority of the known health risk from motor vehicle traffic – diesel PM from primarily trucks, and benzene and 1,3-butadiene from passenger vehicles – diesel PM represents the majority of the potential cancer risk from vehicle traffic.¹⁴ Overall, diesel PM was found to account for, on average, about 68 percent of the air toxics risk in the Basin.¹⁵ In addition to its carcinogenic potential, diesel PM also may contribute to increased respiratory and cardiovascular hospitalizations, worsened asthma and other respiratory symptoms, decreased lung function in children, and premature death for people already with heart or lung disease. Those most vulnerable to the non-cancer health effects of diesel PM are children whose lungs are still developing and the elderly who may have other chronic health problems.¹⁶

Volatile Organic Compounds – VOCs

VOCs are typically formed from the combustion of fuels and/or released through the evaporation of organic liquids. Some VOCs are also classified by the state as toxic air contaminants, though there are no VOC-specific ambient air quality standards. Once emitted, VOCs can mix in the air with other pollutants (e.g. NO_x, CO, SO₂...) and contribute to the formation of photochemical smog.

Existing Conditions

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

14 CARB, Air Quality and Land Use Handbook: A Community Health Perspective, April 2005.

15 SCAQMD, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES IV), May 2015.

16 CARB, Overview: Diesel Exhaust & Health, ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

The Project is located within the 6,745-square-mile South Coast Air Basin that includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. Air quality within the Basin is influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry. These sources in addition to the topography and climate of Southern California combine to make the Basin an area of high air pollution potential. Particularly, ambient pollution concentrations recorded in the Los Angeles County portion of the Basin are among the highest in the four counties comprising the Basin. The USEPA has classified Los Angeles County as a nonattainment area for O₃, PM_{2.5}, and lead, meaning that the Basin does not meet NAAQS for these pollutants. Additionally, this portion of the Basin also does not meet CAAQS for O₃, PM₁₀, and PM_{2.5}. **Table 5.3-1**, above, summarizes State and National Ambient Air Quality Standards and the attainment status for Los Angeles County with respect to each criteria pollutant.

Air Quality Monitoring Data

The SCAQMD monitors air quality conditions at 38 source receptor areas (SRA) throughout the Basin. The Project is located in SCAQMD's SRA No. 7, "East San Fernando Valley." However, because recent air quality data is not available for SRA No. 7, data from the next nearest SRA, SRA No. 6 "West San Fernando Valley" is shown to characterize the area's air quality conditions. **Table 5.3-2** shows pollutant levels, State and federal standards, and the number of exceedances recorded in SRA No. 6 from 2018 through 2020.

**Table 5.3-2
Ambient Air Quality Data – SRA No.6 "West San Fernando Valley"**

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of State/Federal Standards Exceedance		
	2018	2019	2020
Ozone – O₃			
Maximum 1-hour Concentration (ppm)	0.120	0.101	0.133
Days > 0.09 ppm (State 1-hour standard)	14	1	31
Days > 0.070 ppm (Federal 8-hour standard)	49	6	49
Carbon Monoxide – CO			
Maximum 1-hour Concentration (ppm)	3.4	2.6	2.0
Days > 20 ppm (State 1-hour standard)	0	0	0
Maximum 8-hour Concentration (ppm)	2.1	2.2	1.7
Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide – NO₂			
Maximum 1-hour Concentration (ppm)	0.0572	0.0644	0.0604
Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM₁₀			
Maximum 24-hour Concentration (µg/m ³)	N/A	N/A	N/A
Days > 50 µg/m ³ (State 24-hour standard)	N/A	N/A	N/A
PM_{2.5}			
Maximum 24-hour Concentration (µg/m ³)	31.00	30.00	27.60
Days > 35 µg/m ³ (Federal 24-hour standard)	0	0	0
Sulfur Dioxide – SO₂			
Maximum 24-hour Concentration (ppb)	N/A	N/A	N/A

Days > 0.04 ppm (State 24-hour standard)	N/A	N/A	N/A
Lead - Pb			
Maximum Monthly Average Concentration (µg/m ³)	N/A	N/A	N/A
Maximum 3-Month Rolling Averages (µg/m ³)	N/A	N/A	N/A
N/A = data not available ppm = parts per million of air, by volume µg/m ³ = micrograms per cubic meter Source: SCAQMD Historical Data By Year, www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year . Accessed August 22, 2022.			

Existing Health Risk

Based on the MATES V model, the calculated cancer risk from air toxics in the Project area is approximately 431 per one million.¹⁷ In general, the risk near the Project is comparable to other areas in the Mission Hills – Panorama City – North Hills Community Plan Area and other areas in the East San Fernando Valley.

The OEHHA, on behalf of the California Environmental Protection Agency (CalEPA), provides a screening tool called CalEnviroScreen that identifies which California communities are disproportionately burdened by, and vulnerable to, multiple sources of pollution. The tool ranks census tracts in California based on potential exposures to pollutants, adverse environmental conditions, socioeconomic factors, and prevalence of certain health conditions. According to CalEnviroScreen 4.0, the Project's census tract is ranked 90-95th percentile. The tract's pollution-specific burden, irrespective of other factors, is ranked 93th percentile, indicating that it is among the most pollution-burdened tracts in the state.¹⁸

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. Generally speaking, sensitive land uses, or sensitive receptors, are those where sensitive individuals are most likely to spend time. Individuals most susceptible to poor air quality include children, the elderly, athletes, and those with cardiovascular and chronic respiratory diseases. As a result, sensitive receptors to air quality may include schools (i.e., elementary schools or high schools), child care centers, parks and playgrounds, long-term health care facilities, rehabilitation facilities, convalescent facilities, retirement facilities, residences, and athletic facilities. Sensitive receptors in the vicinity of the Project include, but are not limited to, the following:

- **Residential Receptors:** The Project is located approximately 350 feet west of a single-family residential neighborhood to the east of Van Nuys Boulevard. Other multi-family residential receptors to the northeast and east are located nearly 500 feet or more away.

17 South Coast Air Quality Management District, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-V), MATES V Interactive Carcinogenicity Map, 2021, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/home/?data_id=dataSource_105-a5ba9580e3aa43508a793fac819a5a4d%3A238&views=Cancer-Risk%2CClick-tabs-for-other-data, accessed August 22, 2022.

18 Office of Environmental Health Hazard Assessment, CalEnviroScreen 4.0, <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>, accessed August 22, 2022.

- **School Receptors:** The Project is located approximately 420 feet west of Michelle Obama Elementary School (8150 Cedros Avenue) classrooms and 390 feet north of Panorama High School (8015 Van Nuys Boulevard) classrooms.

Other sensitive land uses, such as the Mission Community Hospital (14850 Roscoe Boulevard) and other various school and residential land uses, are located at a greater distance from the Project and would experience lesser impacts.

Existing Project Site Emissions

The Project site is currently improved with an existing 14-story mixed-use building (Existing Building) consisting of 194 dwelling units and 9,533 square feet of commercial uses, as well as surface parking lot areas that would be demolished for the construction of the proposed uses. These parking areas likely generate nominal anthropogenic air emissions from electrical lighting and other non-mobile sources. **Table 5.3-3** provides an estimate of pollutant emissions associated with the Existing Building, inclusive of its related vehicle trips and mobile source emissions.

Table 5.3-3
Project Site – Existing Daily Operations Emissions

Emissions Source	Emissions in lbs per day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area	4.4	0.2	16.1	<0.1	0.1	0.1
Energy	0.1	1.1	0.7	<0.1	0.1	0.1
Mobile Sources	4.3	18.8	49.1	0.2	11.5	3.2
Net Regional Total	8.8	20.2	65.9	0.2	11.7	3.4
Source: NTEC, 2020. Based on CalEEMod 2016.3.2 model runs.						

Methodology

The following analysis focuses on the potential change in air quality conditions that could result from the Project's construction- and operations-related air pollutant emissions. Specific methodologies used to evaluate these emissions are discussed below.

Construction

Construction of the Project could affect local and regional air quality due to the use of gasoline and diesel-powered construction equipment, as well as the generation of construction vehicle trips. Demolition, grading, and any site preparation activities would also result in fugitive dust emissions. It is important to consider that construction emissions can vary substantially from day to day depending on levels of construction activity, the specific types of construction activities taking place, and the types of vehicles/equipment in use. For dust, the prevailing weather conditions can influence emissions.

Based on the criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if its regional emissions

from both direct and indirect construction sources would exceed the threshold levels shown in **Table 5.3-4**.

SCAQMD localized significance thresholds (LSTs) are also included below in **Table 5.3-4**. LSTs represent the maximum emissions from a project that would not be expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards. They are developed based on the ambient concentrations of a given pollutant for a source receptor and distances to the nearest sensitive receptor. The SCAQMD provides LSTs for NO_x, CO, PM₁₀, and PM_{2.5}. The SCAQMD does not provide a LST for SO₂ because land use development projects typically result in negligible construction and long-term operational emissions of this pollutant. Additionally, because VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. However, due to the role that VOCs play in O₃ formation and their classification as a precursor pollutant, a regional emissions threshold has been established. LSTs for the Project were obtained via the SCAQMD's mass rate look-up tables, which are used to determine whether or not a project may generate significant adverse localized air quality impacts.

The Project's construction-related emissions were estimated using SCAQMD's CalEEMod 2016.3.2 model. Modeling results are included in **Appendix B**. The analysis assumes that all construction activities would comply with SCAQMD Rule 403 for fugitive dust, as is mandatory for all construction projects in the Basin.

Table 5.3-4
SCAQMD Construction Emissions Thresholds

Criteria Pollutant	Construction Emissions (lbs per day)	
	Regional	Localized ^A
Volatile Organic Compounds – VOCs	75	-
Nitrogen Oxides - NO _x	100	157
Carbon Monoxide – CO	550	4,747
Sulfur Oxides - SO _x	150	-
Respirable Particulates – PM ₁₀	150	95
Fine Particulates – PM _{2.5}	55	45
^A Localized significance thresholds assumed a 1-acre maximum daily disturbed acreage, which is the smallest size used for analysis in the LST guidance document. Though the total construction site area exceeds 3 acres, due to Project phasing, no more than roughly 1.5 acres of development would occur at any single time, and the maximum daily disturbed acreage would not exceed this figure. A distance of 350 feet was utilized, which corresponds with the distance to the nearest sensitive receptors (residential land uses east of Van Nuys Boulevard). LSTs for this distance were linearly interpolated per SCAQMD guidance. The SCAQMD has not developed LST values for VOC or SO _x . The Project is located in SRA No. 7, "East San Fernando Valley." Sources: SCAQMD, Air Quality Significance Thresholds, revised April 2019; and, SCAQMD, LST Methodology Appendix C – Mass Rate LST Look-Up Table, October 2009.		

Operations

The SCAQMD has also established significance thresholds to evaluate potential impacts associated with long-term project operations. Regional thresholds and LSTs for Project operations

are shown below in **Table 5.3-5**. Operational emissions for the Project were also calculated using CalEEMod 2016.3.2.

Table 5.3-5
SCAQMD Operational Emissions Thresholds

Criteria Pollutant	Operational Emissions (lbs per day)	
	Regional	Localized ^A
Volatile Organic Compounds - VOCs	55	-
Nitrogen Oxides - NO _x	55	174
Carbon Monoxide – CO	550	5,365
Sulfur Oxides - SO _x	150	-
Respirable Particulates – PM ₁₀	150	25
Fine Particulates – PM _{2.5}	55	12
^A Localized significance thresholds assumed a 2-acre area, which is the second smallest project size used for analysis in the LST guidance document. The total Project area is 4.132 acres, which is closer to the 5 acre project size used in the LST guidance document. However, utilizing the smaller site area results in a conservative analysis. A distance of 350 feet was utilized, which corresponds with the distance to the nearest sensitive receptors (residential land uses east of Van Nuys Boulevard). LSTs for this distance were linearly interpolated per SCAQMD guidance. The SCAQMD has not developed LST values for VOC or SO _x . The Project is located in SRA No. 7, “East San Fernando Valley.” Sources: SCAQMD, Air Quality Significance Thresholds, revised April 2019; and, SCAQMD, LST Methodology Appendix C – Mass Rate LST Look-Up Table, October 2009.		

Toxic Air Contaminants (Construction and Operations)

Potential TAC impacts are evaluated by conducting a qualitative analysis consistent with the CARB Handbook, followed by a more detailed analysis (i.e., dispersion modeling), as necessary. The qualitative analysis consists of reviewing the Project to identify any new or modified TAC emissions sources. If the qualitative evaluation does not rule out significant impacts from a new source, or modification of an existing TAC emissions source, a more detailed analysis is conducted.

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

Less Than Significant Impact.

SCAQMD 2022 AQMP and SCAG 2020-2045 RTP/SCS Consistency

The air quality plan applicable to the Project area is the 2022 AQMP, the current management plan for progression toward compliance with State and federal clean air requirements. The Project would be required to comply with all regulatory measures set forth by the SCAQMD. Implementation of the Project would not interfere with air pollution control measures listed in the 2022 AQMP. In addition, as demonstrated in the following analyses, the Project would not result in significant emissions that would jeopardize regional or localized air quality standards.

The following analysis assesses the Project’s consistency with the SCAQMD’s 2022 AQMP and SCAG’s 2020-2045 RTP/SCS. As discussed earlier, the 2022 AQMP’s projections for achieving state and federal air quality goals are based on population, housing, and employment trend

assumptions in SCAG's 2020-2045 RTP/SCS, which are themselves largely based on local growth forecasts from local governments like the City of Los Angeles; therefore, a project is consistent with the 2022 AQMP, in part, if it is consistent with the population, housing, and employment assumptions and smart growth policies that were used in the formation of the AQMP.

The Project's development would not exceed the growth assumptions of the 2020-2045 RTP/SCS. The Project site is classified "C2-2-CDO Commercial" and "M1-1-CDO Limited Industrial," which permit the site's proposed land uses. As such, the RTP/SCS's assumptions about population and employment growth in the City accommodate the Project's land uses on this site. The 2020-2045 RTP/SCS assumes a significant increase in multi-family housing built in infill locations near bus corridors and other transit infrastructure. In some cases the 2020-2045 RTP/SCS projects increases that outpace what is currently anticipated by local general plans.

Development of the Project would be consistent with this land pattern and smart growth policies to increase housing and employment density within close proximity to HQTAs. Not only would the Project be located within a HQTA, but the Project would be less than a half-mile from Van Nuys Station, which provides access to regional Ventura County Line Metrolink and Pacific Surfliner rail lines. High quality bus stops in the vicinity of the Project include Panorama City/Van Nuys line LADOT stops at the intersection of Van Nuys Boulevard and Lanark Street and numerous Metro stops at the intersection of Roscoe Boulevard and Van Nuys Boulevard. Thus, the Project's location provides abundant opportunity for residents, employees, and other users to utilize public transit infrastructure to reduce vehicle trips, specifically vehicle miles traveled (VMT).

City of Los Angeles Policies

In addition to the 2022 AQMP and 2020-2045 RTP/SCS, the City of Los Angeles General Plan Air Quality Element also identifies policies and strategies for advancing the City's clean air goals. As shown below in **Table 5.3-6**, the Project would be consistent with the applicable policies of the Air Quality Element.

Table 5.3-6
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 1.3.1 – Minimize particulate emissions from construction sites.	Consistent – The Project would minimize particulate emissions during construction through best practices and/or SCAQMD rules.
Policy 1.3.2 – Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	Consistent – The Project would not include the development of any unpaved roads or parking lots.
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 – Future employers could implement these transportation demand management strategies that help reduce traffic congestion, VMT, and subsequently air pollution.
Policy 2.1.2 – Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both	Consistent – Future employers could implement these telecommunications strategies that help

the public and private sectors in order to reduce work trips.	reduce traffic congestion, VMT, and subsequently air pollution.
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 – Future property managers could implement these strategies that help reduce traffic congestion, VMT, and subsequently air pollution.
Policy 2.2.2 – Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	Consistent – Future property managers could implement parking management programs that reduce vehicle travel.
Policy 2.2.3 – Minimize the use of single-occupant vehicles associated with special events or in areas and in times of high levels of pedestrian activities.	Not Applicable – The Project would not include any facilities for the types of special events referenced by this policy.
Policy 3.2.1 – Manage traffic congestion during peak hours.	Consistent – The Transportation Assessment prepared for the Project by Overland Traffic Consultants has determined that the Project would not cause significant impacts to traffic congestion at nearby intersections.
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 Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Metro, and other regional agencies on the management 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 Project would be entitled and environmentally cleared at the local level.
Policy 4.2.3 – Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	Consistent – The Project would include 17 short term and 129 long term bicycle parking spaces. These would be in addition to the 19 short term and 128 long term spaces that are included as part of the Existing Building. As discussed earlier, the Project would be located in a HQTa with significant infrastructure to facilitate the use of alternative transportation modes by Project users. Additionally, the City's Mobility Plan 2035 designates Van Nuys Boulevard as a Comprehensive Transit Enhanced Street and Roscoe Boulevard as a Moderate Plus Transit Enhanced Street. This plan also designates Van Nuys Boulevard as Roscoe Boulevard as Pedestrian Enhanced Districts.
Policy 4.2.4 – Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	Consistent – The Project's air quality impacts are analyzed in this document, and as provided herein, all Project impacts with respect to air quality would be less than significant.
Policy 4.2.5 – Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	Consistent – The Project would be located in a HQTa with significant infrastructure to facilitate the use of alternative transportation modes by project users.

Policy 5.3.1 – Support the development and use of equipment powered by electric or low-emitting fuels.	Consistent – The Project would be designed to meet the applicable requirements of the State's Green Building Standards Code and the City's Green Building Code.
Source: NTEC, 2020.	

In conclusion, Project-related growth would be consistent with 2022 AQMP projections that are themselves based on 2020-2045 RTP/SCS projections; the Project's location in a HQTa and a Pedestrian Enhanced District and near Transit Enhanced Streets would be consistent with the latest regional land use planning strategies to reduce VMT and associated air emissions; to be discussed below, air emissions associated with the Project's construction and operations would neither exceed nor contribute to any exceedance of ambient air quality standards and thresholds, nor would they interfere with the AQMP's attainment of air quality standards or interim emissions reductions. As a result, the Project would not conflict with or obstruct the implementation of any applicable air quality plans, and its impact with respect to Threshold (a) would be less than significant.

- b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?**

Less Than Significant Impact.

The Project would contribute to local and regional air pollutant emissions during its construction (short-term) and operations (long-term). However, as discussed in the following analysis, construction and operations of the Project would not result in exceedances of SCAQMD daily thresholds for project-specific impacts that could subsequently cause cumulatively considerable increases in emissions of pollutants for which the Basin is designated as non-attainment.

Construction Emissions

Construction of the Project is anticipated to take approximately 27 months. During this time, a variety of diesel powered vehicles and equipment would be operated on-site. Demolition and grading for the Project would require vehicles such as excavators, bulldozers, loaders, and other heavy equipment. The building construction phase would require vehicles such as forklifts, skid steer loaders, and a crane. **Table 5.3-7**, below, summarizes the estimated construction schedule that was used to model the Project's air quality impacts. In practice, construction could begin at a later time. However, using an earlier start date represents a worst-case scenario for the analysis of construction emissions, because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years. The dates/years referenced below is for reference purpose; what matters is the length of each phase for emissions-per-day thresholds. As shown, the Project would be developed over the course of two non-overlapping construction phases. First, the Parking Building and the surface parking lot would be constructed. Following this, the rest of the site would be graded and construction of the Proposed Building would begin.

**Table 5.3-7
Construction Schedule**

Phase	Parking Building		Residential Building	
	Schedule	Duration	Schedule	Duration
Demolition	July 1, 2021 – July 7, 2021	5 days	Mar 14, 2022 – Mar 18, 2022	5 days
Grading	July 8, 2021 – July 9, 2021	2 days	Mar 21, 2022 – Mar 22, 2022	2 days
Construction	July 12, 2021 – Mar 11, 2022	8 months	Mar 23, 2022 – Sep 22, 2023	1.5 years
Architectural Coatings	Feb 28, 2022 – Mar 11, 2022	2 weeks	July 24, 2023 – Sep 22, 2023	2 months
Construction schedule, including start, end, and duration dates are estimates only. Some overlap of phasing may occur. The analysis assumes that construction will start in 2021. In practice, construction could begin at a later time. However, using an earlier start date represents a worst-case scenario for the analysis of construction emissions, because equipment and vehicle emission factors for later years will be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years. CAJA Environmental Services, July 2020.				

The Project's unmitigated daily regional and local emissions from construction, as estimated using SCAQMD's CalEEMod 2016.3.2 model, are shown in **Table 5.3-8**, below. Regional thresholds and LSTs for each air pollutant are also shown for comparison. As shown, the Project's unmitigated regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. Local emissions also would not exceed SCAQMD LSTs for NO_x, CO, PM₁₀, or PM_{2.5}.

**Table 5.3-8
Regional and Localized Construction Emissions**

	Emissions in lbs per day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Regional Emissions						
<i>Parking Building and surface parking lot</i>						
2021	2.0	23.8	12.9	<0.1	4.1	2.4
2022	28.3	13.8	15.6	<0.1	1.4	0.7
<i>Proposed Building and pool area</i>						
2022	1.7	19.3	15.5	<0.1	3.9	2.2
2023	27.1	12.6	18.3	<0.1	1.7	0.8
Maximum Regional Emissions	28.3	23.8	18.3	<0.1	4.1	2.4
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Localized Emissions						
<i>Parking Building and surface parking lot</i>						
2021	1.9	20.0	11.0	<0.1	3.8	2.3
2022	27.8	10.0	10.3	<0.1	0.4	0.4
<i>Proposed Building and pool area</i>						
2022	1.6	15.9	10.4	<0.1	3.7	2.1
2023	26.4	10.6	11.9	<0.1	0.4	0.4
Maximum Localized Emissions	27.8	20.0	11.9	<0.1	3.8	2.3

Localized Significance Threshold ^A	-	94	1,158	-	26	8
Exceed Threshold?	-	No	No	-	No	No
^A Localized significance thresholds assumed a 1-acre maximum daily disturbed acreage, which is the smallest size used for analysis in the LST guidance document. Though the total construction site area exceeds 3 acres, due to Project phasing, no more than roughly 1.5 acres of development would occur at any single time, and the maximum daily disturbed acreage would not exceed this figure. A distance of 100 meters (328 feet) was utilized, which roughly corresponds with the minimum site distance to the nearest sensitive receptors (350 feet to residential land uses east of Van Nuys Boulevard). The SCAQMD has not developed LST values for VOC or SO _x . The Project is located in SRA No. 7, "East San Fernando Valley." Source: NTEC, 2020.						

Operations Emissions

Emissions associated with the Project's operations were also calculated using CalEEMod 2016.3.2. For this analysis, emissions associated with the Parking Building and the surface parking lot were not inclusive of mobile traffic and vehicles associated with the Existing Building, as the Parking Building and surface parking lot would not create any trips by themselves. Rather, these trips are associated with the Existing Building, and already utilize surface parking at the site. However, an analysis of all site emissions sources, including Existing Building operations, is discussed later in this report. As shown below in **Table 5.3-9**, development of the Parking Building, Warehouse Building, surface parking lot, Proposed Building, and pool area would not introduce any new major sources of air pollution; emissions would not exceed SCAQMD's regional significance thresholds for VOC, NO_x, CO, PM₁₀, and PM_{2.5}, nor would they exceed SCAQMD LSTs for NO_x, CO, PM₁₀, or PM_{2.5}.

Table 5.3-9
Regional and Localized Operational Emissions

Emissions Source	Emissions in lbs per day					
	VOC	NO_x	CO	SO_x	PM₁₀	PM_{2.5}
<i>Parking Building, Warehouse Building, and surface parking lot</i>						
Area	0.6	<0.1	0.1	<0.1	<0.1	<0.1
Energy	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Mobile Sources ^A	0.0	0.0	0.0	0.0	0.0	0.0
<i>Proposed Building</i>						
Area	4.4	0.2	16.5	<0.1	0.1	0.1
Energy	0.1	0.7	0.4	<0.1	0.1	0.1
Mobile Sources	1.6	7.0	23.3	0.1	8.1	2.2
Project Regional Emissions	6.7	7.9	40.3	0.1	8.2	2.4
Regional Daily Thresholds	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Project Localized Emissions	5.0	0.2	16.6	<0.1	0.1	0.1
Localized Significance Thresholds ^B	-	121	1,594	-	8	3
Exceed Threshold?	-	No	No	-	No	No
^A As noted earlier, this analysis does not include mobile traffic and vehicle trips that are associated with the Existing Building. It only considers new emissions sources that would be generated by the Parking Building and surface parking lot.						

^B Localized significance thresholds assumed a 2-acre area, which is the second smallest project size used for analysis in the LST guidance document. The total Project area is 4.132 acres, which is closer to the 5 acre project size used in the LST guidance document. However, utilizing the smaller site area results in a conservative analysis. A distance of 100 meters (328 feet) was utilized, which roughly corresponds with the minimum site distance to the nearest sensitive receptors (350 feet to residential land uses east of Van Nuys Boulevard). The SCAQMD has not developed LST values for VOC or SO_x. The Project is located in SRA No. 7, "East San Fernando Valley." Source: NTEC, 2020.

Overlap Periods and Total Emissions

The Project's phased developed would result in two overlapping periods during which both construction and operations emissions would occur. The following summarizes each period.

First Overlap Period: During this period, both operational emissions from the Existing Building and construction emissions associated with construction of the Parking Building and surface parking lot would occur. This period is anticipated to occur between July 1, 2021, and March 11, 2022.

Second Overlap Period: During this period, operational emissions from the Existing Building, Parking Building, and surface parking lot would overlap with construction emissions associated with the construction of the Proposed Building. This period is anticipated to occur between March 14, 2022, and September 22, 2023.

The emissions associated with each overlap period are shown below in **Table 5.3-10**. The most severe possible overlapping emissions scenarios were considered for the analysis. Also included in that table is the total emissions that would be associated with the operations of the entire site, as would occur upon the completion of all construction activities. As shown, no period or scenario would result in the exceedance of SCAQMD regional daily thresholds or LSTs. As a result, the Project's impacts on regional and localized air quality would be considered less than significant.

Table 5.3-10
Overlap Period Emissions and Total Emissions

	Emissions in lbs per day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
First Overlap Period						
<i>Regional Emissions</i>						
Existing Building operations emissions	8.8	20.2	65.9	0.2	11.7	3.4
Parking Building <i>Warehouse Building</i> , and surface parking lot maximum construction emissions	28.3	23.8	15.6	<0.1	4.1	2.4
Combined Regional Emissions	37.1	44.0	81.5	0.2	15.8	5.8
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
<i>Localized Emissions</i>						
Existing Building operations emissions	4.4	0.2	16.1	<0.1	0.1	0.1
Parking Building and surface parking lot maximum construction emissions	27.8	20.0	11.0	<0.1	3.8	2.3
Combined Localized Emissions	32.2	20.2	27.1	<0.1	3.9	2.4
Localized Significance Threshold	-	94	1,158	-	26	8

Exceed Threshold?	-	No	No	-	No	No
Second Overlap Period						
<i>Regional Emissions</i>						
Existing Building operations emissions	8.8	20.2	65.9	0.2	11.7	3.4
Parking Building Warehouse Building, and surface parking lot operations emissions	0.6	<0.1	0.1	<0.1	<0.1	<0.1
Proposed Building maximum construction emissions	27.1	19.3	18.3	<0.1	3.9	2.2
Combined Regional Emissions	36.5	39.5	84.3	0.2	15.6	5.6
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
<i>Localized Emissions</i>						
Existing Building operations emissions	4.4	0.2	16.1	<0.1	0.1	0.1
Parking Building Warehouse Building, and surface parking lot operations emissions	0.6	<0.1	0.1	<0.1	<0.1	<0.1
Proposed Building maximum construction emissions	26.4	15.9	11.9	<0.1	3.7	2.1
Combined Localized Emissions	31.4	16.1	28.1	<0.1	3.8	2.2
Localized Significance Threshold	-	94	1,158	-	26	8
Exceed Threshold?	-	No	No	-	No	No
Total Site Emissions						
<i>Regional Emissions</i>						
Existing Building operations emissions	8.8	20.2	65.9	0.2	11.7	3.4
Parking Building Warehouse Building, and surface parking lot operations emissions	0.6	<0.1	0.1	<0.1	<0.1	<0.1
Proposed Building and pool area operations emissions	6.1	7.9	40.1	<0.1	8.2	2.4
Combined Regional Emissions	15.5	28.1	106.1	0.2	19.9	5.8
Regional Daily Threshold	55	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
<i>Localized Emissions</i>						
Existing Building operations emissions	4.4	0.2	16.1	<0.1	0.1	0.1
Parking Building Warehouse Building, and surface parking lot operations emissions	0.6	<0.1	0.1	<0.1	<0.1	<0.1
Proposed Building operations emissions	4.4	0.2	16.5	<0.1	0.1	0.1
Combined Localized Emissions	9.4	0.4	32.7	<0.1	0.2	0.2
Localized Significance Threshold.	-	94	1,158	-	8	3
Exceed Threshold?	-	No	No	-	No	No
For assessing the significance of the first and second overlap periods, SCAQMD construction-related thresholds were applied, as each overlap period would be temporary in nature and not permanent, as operations emissions would be. However, it should be noted that neither construction nor operations related thresholds would be exceeded for either overlap period. For assessing the significance of Total Site Emissions, SCAQMD operations-related thresholds were applied, as the Total Site Emissions scenario represents the concurrent operations of all site uses. Source: NTEC, 2020.						

Emissions Summary – Health Impact

The Project's construction and operations emissions would not exceed the applicable regional thresholds and LSTs. As discussed, SCAQMD thresholds represent the maximum emissions that

would not be expected to cause or materially contribute to an exceedance of NAAQS or CAAQS, which themselves represent the maximum concentrations of pollutants that can be present in outdoor air without any harmful effects on people or the environment. Therefore, neither the Project's construction nor operations emissions would be expected to cause or measurably contribute to adverse health impacts, and the Project's construction and operations emissions impacts on regional and localized air quality would be less than significant.

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

Less Than Significant Impact.

Construction Emissions

As discussed previously, the Project's construction emissions would not exceed the SCAQMD's regional significance thresholds. Construction emissions also would not exceed SCAQMD LSTs, meaning that nearby sensitive receptors generally located 350 feet or more from the Project would not be exposed to substantial pollutant concentrations that would present a public health concern.

The primary TAC that would be generated by construction activities is diesel PM, which would be released from the exhaust pipes of diesel-powered construction vehicles and equipment. According to SCAQMD methodology, health risks from carcinogenic air toxics such as diesel PM are usually quantified in terms of individual cancer risk, which is the likelihood that a person exposed to concentrations of TACs over a 30-year period every day will contract cancer based on standard risk-assessment methodology. However, the anticipated duration of construction activities associated with the Project's implementation is only approximately 27 months, and daily diesel PM emissions would vary considerably day by day, and by phase. After the initial demolition and grading activities, which would be minimal (an estimated one week per construction phase), the daily activities of off-road diesel-powered vehicles would reduce substantially. Additionally, as shown earlier, the Project's PM emissions, which include exhaust PM, would not exceed applicable regional thresholds and LSTs. As a result, TAC emissions from the Project's construction equipment are expected to result in less than significant health risk impacts.

Operations Emissions

As also discussed previously the Project's operational emissions would not exceed SCAQMD regional significance thresholds or LSTs.

Additionally, the Project does not propose typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes, automotive repair facilities, or warehouse distribution facilities (the proposed warehouse use would be private and would not constitute a commercial, industrial, or public use) As a result, the Project's operations would not warrant the need for a health risk assessment, and this impact would be less than significant.

Though the Project would generate traffic that produces and contributes to off-site emissions, Project traffic generation would not result in exceedances of CO air quality standards at nearby roadways due to three key factors. First, CO hotspots are rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to the

Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology and the increasing penetration of this technology in the vehicle fleet.

As shown earlier in **Table 5.3-2**, CO levels in the Project area are well-below federal and state standards, as are CO levels in the Basin itself. No exceedances of CO have been recorded at nearby monitoring stations for some time, and the Basin is currently designated as a CO attainment area for both CAAQS and NAAQS. Finally, the Project would not contribute to the levels of congestion and emissions necessary to trigger a potential CO hotspot. Therefore, the Project's potential to expose sensitive receptors to substantial CO concentrations as a result of CO hotspots would be less than significant.

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

Less Than Significant Impact.

According to the SCAQMD CEQA Air Quality Handbook, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding.

The Project involves the construction and operation of residential and commercial uses, which are not typically associated with odor complaints. Potential sources that may emit odors during construction activities include equipment exhaust. Odors from these sources would be localized and generally confined to the immediate area surrounding the Project. The Project would use typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. The Project would be consistent with SCAQMD Rule 1113 – Architectural Coatings.

With respect to operations, odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. As the Project involves no elements related to these types of activities, no odors from these types of uses are anticipated. Good housekeeping practices would be sufficient to prevent nuisance odors. In addition, SCAQMD Rule 402 (Nuisance) and 1139 (Odors), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Project's long-term operations. Therefore, potential operational odor impacts would be less than significant.

Cumulative Impacts

Less Than Significant.

The CEQA Air Quality Handbook identifies possible methods to determine the cumulative significance of land use projects. All of SCAQMD's methods are based on performance standards and emission reduction targets necessary to attain the federal and State air quality standards identified in the AQMP. The analysis presented above evaluates whether the project is consistent with the AQMP and thus, would not jeopardize attainment of State and federal ambient air quality standards in the Basin. In addition to the cumulative significance methodologies contained in CEQA Air Quality Handbook, SCAQMD staff has suggested that the emissions-based thresholds

be used to determine if a project's contribution to regional cumulative emissions is cumulatively considerable. Individual projects that exceed SCAQMD-recommended daily thresholds for project-specific impacts would be considered to cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

As presented above, construction and operation of the Project would result in daily emissions that fall below thresholds of significance recommended by SCAQMD. Therefore, the contribution of these emissions to the air quality within the South Coast Air Basin is not considered to be cumulatively considerable, and thus a less than significant impact. The project's implementation would not result in any new exceedance of air pollution standards nor contribute significantly to an existing air quality violation. Furthermore, the analysis determined that the implementation of the project would not result in any significant adverse air quality impacts. As a result, no significant adverse cumulative impacts would occur.

IV. BIOLOGICAL RESOURCES

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
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 Game or US Fish and Wildlife Service?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
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?	☐	☐	☐	☒

The section is based on the following item, included as **Appendix C** of this SCEA:

C Tree Report, The Tree Resource, May 21, 2020.

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

Less Than Significant Impact.

The Project Site is located within a highly urbanized area. The City encompasses a variety of open space and natural areas that serve as habitat for sensitive species. Much of this natural open space is found in or is adjacent to the foothill regions of the San Gabriel, Santa Susana, Santa Monica, and Verdugo Mountains, the Simi Hills, and along the coastline between Malibu and the Palos Verdes Peninsula. Many of the outlying areas are contiguous with larger natural areas, and may be part of significant wildlife habitats or movement corridors. The central and valley portions of the City contain fewer natural areas.

There are existing onsite decorative trees and palms in the parking lot and along Van Nuys Boulevard. None is a protected species.¹⁹ Some may be affected and removed as part of the development. The removal of vegetation and disturbances to the ground may result in take of nesting native birds on the Project Site.

Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 CFR Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). The Project would comply with the regulations of the California Department of Fish and Wildlife (CDFW)²⁰ and U.S. Fish and Wildlife Service (USFWS).²¹

As a standard practice, the Department of Building and Safety generally imposes a condition that requires grading and earthwork activities (including disturbances to native and non-native vegetation, structures and substrates) to take place outside of the breeding bird season which generally runs from March 1 – August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). If the Project's activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the Applicant would be required to arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the Project Site, as access to adjacent areas allows. If a protected native bird is found, the Applicant would be required to delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting.

The Project Site does not contain any habitat capable of sustaining any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Additionally, there are no known locally designated natural communities at the Project Site or in the immediate vicinity, nor is the Project Site located immediately adjacent to undeveloped natural open space or a natural water source that may otherwise serve as habitat for State- or federally-listed species.

The Project would adhere to existing laws and regulation. Therefore, impacts would be less than significant.

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

No Impact.

¹⁹ [Tree Report](#), The Tree Resource, May 21, 2020.

²⁰ <https://wildlife.ca.gov/Conservation/Environmental-Review>, accessed August 22, 2022.

²¹ <https://www.fws.gov/law/migratory-bird-treaty-act-1918>, accessed August 22, 2022.

No riparian or other sensitive habitat areas are located on or adjacent to the Project Site.²² The Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities. Therefore, no impact would occur.

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

No Impact.

A significant impact would occur if state or federally protected wetlands would be modified or removed by a project without adequate mitigation. The Project Site is located in an urbanized area of the City. No federally protected wetlands (e.g., estuarine and marine deepwater, estuarine and marine, freshwater pond, lake, riverine) occur on or in the immediate vicinity of the Project Site. The nearest wetland habitat is at Los Angeles River, classified as Riverine, and located approximately 2,750 feet west of the Project Site.²³ The Project will not result in the direct removal, filling, or hydrological interruption of a state or federally protected wetland. Therefore no impact would occur.

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

No Impact.

Due to the existing urban development on the Project Site and in the adjacent surroundings, the Project Site does not function as a corridor for the movement of native or migratory animals. No native wildlife nurseries are located in the project area. Therefore, no impact would occur.

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

Less Than Significant Impact.

The City of Los Angeles Native Tree Preservation Ordinance protects any of the following Southern California native tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree is a protected tree:²⁴

- Oak tree including Valley Oak (*Quercus lobata*), California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus dumosa*);

22 U. S. Fish & Wildlife Service, Wetlands Inventory, Riparian Layer: <http://www.fws.gov/wetlands/Data/Mapper.html>, accessed August 22, 2022.

23 U. S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Layer: <http://www.fws.gov/wetlands/Data/Mapper.html>, accessed August 22, 2022.

24 City of Los Angeles, Ordinance No. 177404: http://cityplanning.lacity.org/Code_Studies/Other/ProtectedTreeOrd.pdf

- Southern California Black Walnut (*Juglans californica* var. *californica*);
- Western Sycamore (*Platanus racemose*); and
- California Bay (*Umbellularia californica*)

Effective February 4, 2021 in Ordinance No 186,873, the City added Mexican elderberry and toyon shrubs to the list of protected species.

The Site contains no street trees. There are 141 existing onsite decorative trees and palms in the parking lot and along Van Nuys Boulevard. None is a protected species.²⁵ Any tree removal will comply with the City's Tree Replacement Program (Urban Forestry Division, Bureau of Street Services for the street tree).

The Project would not impact any protected trees. Therefore, impacts would be less than significant.

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

No Impact.

The Project Site is located in an urbanized area of the City. Due to the existing urban development on the Project Site and in the adjacent surroundings, there are no known locally designated natural communities on the Project Site.

There are no City or County significant ecological areas on or around the Project Site.²⁶ There are no California Natural Community Conservation Plans (CNCCP) in the area. The only CNCCP in LA County is in the City of Rancho Palos Verdes.²⁷

There are no Habitat Conservation Plans near the Site.²⁸

The Project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan. Therefore, no impact would occur.

Cumulative Impacts

Less Than Significant.

Development of the Project in combination with related projects would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFW or the USFWS as no such habitat occurs in the

²⁵ [Tree Report](#), The Tree Resource, May 21, 2020.

²⁶ Navigate LA, Significant Ecological Areas layer: <http://navigatela.lacity.org/navigatela/>, accessed August 22, 2022.

²⁷ California Natural Community Conservation Plans, April 2019, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed August 22, 2022.

²⁸ USFWS, Habitat Conservation Plans: <https://ecos.fws.gov/ecp0/conservationPlan/region/summary?region=8&type=HCP>, accessed August 22, 2022.

vicinity of the Project Site due to the existing urban development. Moreover, development of the related projects is expected to occur in accordance with adopted plans and regulations. Each of the related projects would be subject to discretionary City approval and project-specific CEQA review that would address biological resources. Thus, cumulative impacts to biological resources would be less than significant.

V. CULTURAL RESOURCES

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

The section is based on the following items, included as **Appendix D** of this SCEA:

D-1 Historic Resources Report, Jenna Snow Historic Preservation Consulting, May 2022.

D-2 Archaeological Response, South Central Coastal Information Center, October 3, 2020.

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

Less Than Significant Impact.

State CEQA Guidelines Section 15064.5 defines a historical resource as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in a historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if a project were to adversely affect a historical resource meeting one of the above definitions.

According to ZIMAS, the Project Site does not require historic preservation review.²⁹

There are no Historic Preservation Overlay Zones (HPOZs) around the Project Site.³⁰

Three resources in the area are considered eligible for National Register, California Register, or local designation:³¹

- Panorama Tower (8155 Van Nuys). The Existing Building on the Project Site is identified in SurveyLA as an "Excellent example of Corporate International architecture; designed by

²⁹ ZIMAS search: <http://zimas.lacity.org/>.

³⁰ HPOZs: <https://planning.lacity.org/preservation-design/local-historic-districts>, accessed August 22, 2022.

³¹ HistoricPlacesLA: <http://www.historicplacesla.org/map>, accessed August 22, 2022.

significant Los Angeles architectural firm Welton Becket and Associates.”³² The Existing Building was previously adaptively reused and would remain on the Site. The Proposed Building and Parking Building would not affect the Existing Building.

- Panorama Plaza Building (8121 Van Nuys) to the south of the Site. It is an “Excellent example of Corporate International architecture, designed by noted Los Angeles architect Maxwell Starkman. Less than 50 years old and not of exceptional importance; therefore not eligible for listing in the National Register at this time.”³³
- Titus Building (14547 Titus Street), north across Titus Street is designed in a Mid-Century Modern style.
- Panorama Bank Building (8201 Van Nuys), north across Titus Street. It is an “Excellent example of Expressionistic architecture; designed by significant Los Angeles architect W.A. Sarmiento.”³⁴

The Panorama Tower building was identified in SurveyLA, the City of Los Angeles’ citywide historic resources survey, as appearing eligible for listing in the National Register of Historic Places (National Register), California Register of Historical Resources (California Register) as well as a local Historic Cultural Monument (HCM) as an “excellent example of Corporate International architecture; designed by significant Los Angeles architectural firm Welton Becket and Associates.” Due to alterations as part of its 2016 rehabilitation, specifically replacement of the windows, the building does not appear to retain sufficient integrity for listing in the National Register, California Register, or as a local HCM.

The Project does not appear to have an indirect impact on the adjacent Panorama Plaza building. Six-stories tall, the Panorama Plaza building was constructed assuming it would be adjacent to another 13-story tower. The proposed seven-story residential building is shorter than what was initially planned and only one-story higher than the Panorama Plaza building. Although set to the sidewalk line, while the Panorama Towers building has a landscaped plaza, the proposed project will not diminish the visibility of the Panorama Towers building. In addition, while the proposed new building will be placed close to the north elevation of the Panorama Plaza building, that elevation of the older building is a windowless, textured masonry wall with no articulation, echoed on the south elevation. While the blank wall may be considered a character-defining feature, decreasing visibility of a bland, featureless wall cannot be described as an indirect impact. As the Project maintains the mass, scale, and proportions of the Panorama Plaza building, it conforms with Standard 9 and therefore will not cause an indirect impact on the historical resource.

The Titus Building will be located directly across Titus Street from the three-story parking garage and one-story warehouse. Significant for its distinctive Mid-Century Modern architecture, the proposed parking garage and warehouse maintain the size, scale and industrial nature of this area of Titus Street, in conformance with Standard 9. As the setting of the Titus Building will only minimally change and the Project will not destroy its distinctive appearance, the Project will not

32 SurveyLA: https://planning.lacity.org/odocument/f2154207-b92a-445d-b663-f26f3e70345b/Mission_Hills-Panorama_City-North_Hills_Individual_Resources.pdf, accessed August 22, 2022.

33 SurveyLA: https://planning.lacity.org/odocument/f2154207-b92a-445d-b663-f26f3e70345b/Mission_Hills-Panorama_City-North_Hills_Individual_Resources.pdf, accessed August 22, 2022.

34 SurveyLA: https://planning.lacity.org/odocument/f2154207-b92a-445d-b663-f26f3e70345b/Mission_Hills-Panorama_City-North_Hills_Individual_Resources.pdf, accessed August 22, 2022.

cause an indirect impact on the Titus Building. Therefore, the Project will not cause an indirect impact on the Titus Building.

Panorama Bank Building. Located north of the Panorama Towers building on the northwest corner of Van Nuys Boulevard and Titus Street, the Panorama Bank Building is significant for its uniquely sculptural architecture designed by important architect, W.A. Sarmiento. The Project will be separated from the Panorama Bank Building by the existing Panorama Towers building and will be minimally visible to or from the proposed seven-story residential building. As the setting of the Panorama Bank Building will only minimally change and the proposed project will not destroy its distinctive appearance, the Project will not cause an indirect impact on the Panorama Bank Building.

The Project conforms with the Secretary's Standards and will not pose a direct or indirect impact to any of the three identified historical resources in the immediate vicinity within the study area (Panorama Bank Building, Titus Building, Panorama Plaza Building). Therefore, the Project is anticipated to have a less than significant impact on historical resources.³⁵

The Project would not introduce incompatible visual elements and would not affect views of any of the historic resources. The Project would not cause any substantial change in the immediate surroundings such that the significance of the historical resources would be materially impaired. No historical resources would be demolished, altered, or relocated as a result of the Project. Therefore, impacts would be less than significant.

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

Less Than Significant Impact.

Sate CEQA Guidelines Section 15064.5 defines significant archaeological resources as resources that meet the criteria for historical resources or resources that constitute unique archaeological resources. A project-related significant impact could occur if a project would significantly affect archaeological resources that fall under either of these categories.

There are no known archaeological resources at the Project Site.³⁶ The South Central Coastal Information Center (SCCIC) conducted a records search for the Project Site and a half-mile radius around the Site. The records search was completed in October 2020. The search did not identify any known archaeological resources on the Project Site.³⁷

The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains an existing building and surface parking lot. The Project

35 Historic Resources Report, Jenna Snow Historic Preservation Consulting, May 2022.

36 City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Section 2.15, Figure CR-1, Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles: <https://planning.lacity.org/odocument/6aa45676-e431-43ab-8621-dd493e64d2ea/FrameworkFEIR.pdf>, accessed August 22, 2022.

37 Archaeological Response, South Central Coastal Information Center, October 3, 2020.

would require excavation for mechanical uses, utility and foundation work, and grading. There is a possibility of encountering a resource.

If archaeological resources are discovered during excavation, grading, or construction activities, work will cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the Project will not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Therefore, impacts would be less than significant.

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

Less Than Significant Impact.

A significant impact would occur if previously interred human remains would be disturbed during excavation of the project site.

The Project Site, located in an urbanized area, has been previously disturbed by past development activities and contains existing buildings and surface parking lot. The Project would require excavation for mechanical uses, utility and foundation work, and grading. No known traditional burial sites have been identified on the Project Site.

If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98, as amended by Assembly Bill 2641, protects cultural resources and provides procedures in the event human remains of Native American origin are discovered during Project implementation and land owners are required to address the Project's potential impacts to human remains.

In the event that human remains are discovered during excavation activities, work will stop immediately and the County Coroner will be contacted. If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC would immediately notify the person it believes to be the most likely descendent of the deceased Native American. The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC. Therefore, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

Impacts related to cultural resources are site-specific and as such, are assessed on a site-by-site basis. Cumulative impacts would occur if the Project and related projects were to have combined

significant adverse effects on historical resources of the same type in the immediate vicinity, or if they were to contribute to changes within a historic district; however, there are no historical resources on the Project Site. The related projects are isolated by intervening development and located in a number of locations of varying character and context. The Project would not result in direct or indirect impacts to historical resources, and, the Project's effects would not be cumulatively considerable, and cumulative impacts would be less than significant. Many of the related projects would require excavation that could potentially expose or damage potential archaeological resources or disturb human remains. However, the related projects are located in developed urban areas with sites that have been previously disturbed, and the potential to encounter and cause a significant impact on surface resources is unlikely. Further, in association with CEQA review, and depending on the depth of excavation and sensitivity of respective sites, compliance with regulatory measures for the protection of human remains, would be identified for those related projects that have the potential to cause significant impacts to undiscovered archaeological resources or to disturb human remains.

VI. ENERGY

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

The section is based the following item, included as **Appendix E** of this SCEA:

E Energy and Fuel Calculations, CAJA Environmental Services, July 2020.

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

Regulatory Framework

Federal Regulations

First established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) standards reduce energy consumption by increasing the fuel economy of cars and light trucks. The National Highway Traffic Safety Administration (NHTSA) and U.S. Environmental Protection Agency (USEPA) jointly administer the CAFE standards. The U.S. Congress has specified that CAFE standards must be set at the “maximum feasible level” with consideration given for: (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy.³⁸

State Building Energy Efficiency Standards

The Building Energy Efficiency Standards (Title 24 Part 6) were first adopted in 1976 and have been updated periodically since then as directed by statute. The Standards contain energy and water efficiency requirements (and indoor air quality requirements) for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. Public Resources Code Sections 25402 subdivisions (a)-(b) and 25402.1 emphasize the importance of building design and construction flexibility by requiring the Energy Commission to establish performance standards, in the form of an “energy budget” in terms of the energy consumption per square foot of floor space. For this reason, the Standards include both a prescriptive option, allowing builders to comply by using methods known to be efficient, and a performance option, allowing builders complete freedom in their designs provided the building achieves the same overall efficiency as an equivalent building using the prescriptive option. Reference Appendices are adopted along

³⁸ CAFE standards: www.nhtsa.gov/fuel-economy.

with the Standards that contain data and other information that helps builders comply with the Standards.

The 2019 Building Energy Efficiency Standards improve upon the 2016 Energy Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. Buildings permitted on or after January 1, 2020, must comply with the 2019 Standards. On the residential side, the standards encourage demand responsive technologies including battery storage and heat pump water heaters and improve the building's thermal envelope through high performance attics, walls and windows to improve comfort and energy savings. In nonresidential buildings, the standards update indoor and outdoor lighting making maximum use of LED technology. For residential and nonresidential buildings, the standards enable the use of highly efficient air filters to trap hazardous particulates from both outdoor air and cooking and improve kitchen ventilation systems.

California Green Building Code

Part 11 of the Title 24 California Building Standards Code is referred to as the California Green Building Standards Code, or CalGreen. The purpose of the California Green Building Standards Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." As of January 1, 2011, the CalGreen is mandatory for all new buildings constructed in the state. CalGreen establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design and overall environmental quality. CalGreen was most recently updated in 2019 to include new mandatory measures for residential as well as nonresidential uses; the new measures took effect on January 1, 2020.

California Renewable Energy Resources Act

LADWP is subject to the California Renewable Energy Resources act and thus is required to commit to the use of renewable energy sources, as defined in its 2013 Renewables Portfolio Standard Policy and Enforcement Program. LADWP has committed to meeting the requirement to procure at least 33 percent of their energy portfolio from renewable sources by 2020 as fiscal constraints, renewable energy pricing, system integration limits, and transmission constraints permit. Eligible renewable resources are defined in the 2013 Renewable Portfolio Standard to include biodiesel; biomass; hydroelectric and small hydro (30 mw or less); Los Angeles Aqueduct hydro power plants; digester gas; fuel cells; geothermal; landfill gas; municipal solid waste; ocean thermal, ocean wave, and tidal current technologies; renewable derived biogas; multi-fuel facilities using renewable fuels; solar photovoltaic; solar thermal electric; wind; and "other renewables that may be defined later".³⁹

Senate Bill (SB) 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of Executive Order B-30-15. The

³⁹ City of Los Angeles, Department of Water and Power, Renewables Portfolio Standard Policy and Enforcement Program, amended December 2013.

objectives of SB 350 are: (1) to increase the procurement of electricity from renewable sources from 33 percent to 50 percent by December 31, 2030; and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.⁴⁰ One of the objectives of SB 350 is to increase procurement of California's electricity from renewable sources from 33 percent to 50 percent by 2030.

SB 100, signed in August 2018, requires 100 percent renewable energy by 2045. The California Public Utilities Commission (CPUC), the California Energy Commission (CEC), the California Air Resources Board (CARB), and all other state agencies are charged with incorporating the zero-carbon mandate of SB 100 into relevant planning. Additionally, the CPUC, CEC, and CARB must report on implementation to the legislature by January 1, 2021 and every four years thereafter. Accordingly, LADWP is required to procure at least 50 percent of their energy portfolio from renewable sources by 2030 and 100 percent by 2045.

The LADWP electricity portfolio in 2017 is made up of coal (18 percent), natural gas (31 percent), renewables⁴¹ (30 percent), nuclear (10 percent), unspecified sources (7 percent), and large hydroelectric (4 percent).⁴² This represents the available off-site renewable sources of energy that would meet the Project's energy demand.

With regards to on-site renewable energy sources, the Project would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors as required by the LAMC. However, due to the Project Site's location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, while methane is a renewable derived biogas, it is not available on the Project Site in commercially viable quantities or form, and its extraction and treatment for energy purposes would result in secondary impacts. Additionally, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin. Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential.⁴³

Assembly Bill 32 and Senate Bill 32

Assembly Bill (AB) 32 (Health and Safety Code Sections 38500–38599), also known as the California Global Warming Solutions Act of 2006, commits the State to achieving year 2000 GHG emission levels by 2010 and year 1990 levels by 2020. To achieve these goals, AB 32 tasked the CPUC and the CEC with providing information, analysis, and recommendations to the California Air Resources Board (CARB) regarding ways to reduce GHG emissions in the electricity and natural gas utility sectors.⁴⁴

40 Senate Bill 350 (2015–2016 Reg. Session) Stats 2015, ch. 547.

41 Renewable energy sources include biomass & waste (1%), geothermal (4%), small hydroelectric (4%), solar (11%), and wind (10%).

42 https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=1c8pp2cnbp_4&_afLoop=441342020819221, accessed March 23, 2020.

43 CEC, National Renewable Energy Laboratory (NREL) Wind Prospector, <https://maps.nrel.gov/windprospector/#/?aL=kM6jR-%255Bv%255D%3Dt%26kM6jR%255Br%255D%3Dt%26qCw3hR%255Bv%255D%3Dt%26qCw3hR%255Bd%255D%3D1%26qCw3hR%255Br%255D%3Dt&bL=groad&cE=0&IR=0&mC=34.09773289693434%2C118.32507133483887&zL=14>.

44 Ibid.

Signed in September 2016 by Governor Jerry Brown, SB 32 updates AB 32 to include an emissions reductions goal for the year 2030. Specifically, SB 32 requires CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. New goals outlined in SB 32 update AB 32's scoping plan requirement and involve 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.

It should be noted that the State Legislature has not yet adopted a target for the 2050 horizon year, though Executive Order S-3-05 issued by Governor Arnold Schwarzenegger and Executive Order B-30-15 issued by Governor Jerry Brown each establish a GHG target of 80 percent below 1990 levels for this year.

Assembly Bill 1493 (AB 1493)/Pavley Regulations

AB 1493 (commonly referred to as CARB's Pavley regulations) was the first legislation to regulate GHG emissions from new passenger vehicles. Under this legislation, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles (cars and light-duty trucks) for model years 2009–2016. The Pavley regulations to reduce GHG emissions from California's passenger vehicles by improving fuel efficiency and reducing motorists' costs.⁴⁵

Low Carbon Fuel Standard

The Low Carbon Fuel Standard (LCFS), established in 2007 through Executive Order S-1-07 and administered by CARB, requires producers of petroleum-based fuels to reduce the carbon intensity of their products, starting with 0.25 percent in 2011 and culminating in a 10-percent total reduction in 2020. Petroleum importers, refiners and wholesalers can either develop their own low carbon fuel products, or buy LCFS credits from other companies that develop and sell low carbon alternative fuels, such as biofuels, electricity, natural gas, and hydrogen.⁴⁶

CARB's Advanced Clean Cars Regulation

Closely associated with the Pavley regulations, the Advanced Clean Car Standards emissions-control program (ACC program) was approved by CARB in 2012. The program combines the control of smog, soot, and GHGs with requirements for greater numbers of zero-emission vehicles for model years 2017–2025. By 2025, when the rules will be fully implemented, new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions. Additionally, environmentally superior cars will be available across the range of models (compacts, sport utility vehicles (SUVs), pickups, and minivans) and consumer savings on fuel costs will average \$6,000 over the life of the car.⁴⁷

Airborne Toxic Control Measure

The California Air Resources Board (CARB) has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. This measure prohibits diesel-fueled commercial

45 Clean Car Standards—Pavley, Assembly Bill 1493, www.energy.ca.gov/low_carbon_fuel_standard/,

46 Low Carbon Fuel Standard: Fuels and Transportation Division Emerging Fuels and Technologies Office, www.energy.ca.gov/low_carbon_fuel_standard/

47 California Renewables Portfolio Standard (RPS), http://www.cpuc.ca.gov/RPS_Homepage/

vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h))⁴⁸ to reduce NOX, PM10, and PM2.5 emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023. In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014 and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Construction workers working on the Site would be required to demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment.

Sustainable Communities Strategy

The Sustainable Communities and Climate Protection Act of 2008, or Senate Bill 375 (SB 375), coordinates land use planning, regional transportation plans, and funding priorities to help California meet the GHG reduction mandates established in AB 32. SB 375 specifically requires the Metropolitan Planning Organization (MPO) to prepare a “sustainable communities strategy” (SCS) as a part of its Regional Transportation Plan (RTP) that will achieve GHG emission reduction targets set by CARB for the years 2020 and 2035 by reducing vehicle miles traveled (VMT) from light-duty vehicles through the development of more compact, complete, and efficient communities.⁴⁹

The Project Site is located within the planning jurisdiction of the Southern California Association of Governments (SCAG). The RTP/SCS establishes High-Quality Transit Areas (HQTAs), which are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Local jurisdictions are encouraged to focus housing and employment growth within HQTAs to reduce VMT. The Project Site is located within a HQTA.⁵⁰

SCAG introduced its proposed 2020-2045 RTP/SCS, titled “Connect SoCal,” which was formally adopted by SCAG’s Regional Council on September 3, 2020. SCAG’s 2020-2045 RTP/SCS outlines more than \$638 billion in transportation system investments through 2045. It was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. The 2020-2045 RTP/SCS includes strategies for accommodating projected population, household and employment growth in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are

48 California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, <http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf>, accessed March 23, 2020.

49 Sustainable Communities, www.arb.ca.gov/cc/sb375/sb375.htm

50 SCAG GIS: http://gisdata-scag.opendata.arcgis.com/datasets/1f6204210fa9420b87bb2e6c147e85c3_0, accessed July 27, 2020.

directly tied to supporting related GHG emissions reductions through increasing transportation choices with a reduced dependence on automobiles and an increase growth in walkable, mixed-use communities and HQTAs and by encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region.

Senate Bill 1389

Senate Bill 1389 (Public Resources Code Sections 25300–25323; SB 1389) requires the development of an integrated plan for electricity, natural gas, and transportation fuels. The California Energy Commission must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. The most recently completed report, the 2015 Integrated Energy Policy Report, addresses a variety of issues related to energy efficiency, benchmarking under the Assembly Bill 758 Action Plan, strategies related to data for improved decisions in the Existing Buildings Energy Efficiency Action Plan, building energy efficiency standards, achieving 50 percent renewable by 2030, among other issues.⁵¹

2017 Power Strategic Long-Term Resource Plan⁵²

The LADWP released the 2017 Power Strategic Long-Term Resource Plan (SLTRP) in December 2017, which provides a 20-year framework to ensure LADWP can meet the future energy needs of its ratepayers by forecasting demand for energy and determining how that demand will be met. The SLTRP is an update of the 2016 Integrated Resource Plan (IRP), and reflects evolving environmental, regulatory, and economic developments. The 2016 IRP included a newly created and redesigned energy efficiency (EE) program to achieve at least 10 percent less customer usage of electricity to 2020; development of a new Power System Reliability Program (PSRP) to incorporate not only distribution, but also generation, transmission, and substations with a new prioritization model to improve system reliability; and plans for an agreement between Intermountain Power Agency and the Intermountain Power Project (IPP) participants to replace IPP coal-fired generation with new highly efficient gas-fired generators by no later than July 1, 2025, two years earlier than recommended in 2012's IRP.

The 2017 SLTRP incorporates updates to reflect the latest load forecast, fuel price and projected renewable price forecasts, and other modeling assumptions. Major renewable projects approved or implemented include the approval of 460 mw of large scale solar, approval of the 250 mw Beacon Solar Project, implementation of Pine Tree and Adelanto Solar, and implementation of two geothermal projects. An innovative Solar Feed-in-Tariff (FiT) Program was implemented by the Department of Energy, which consists of a FiT 100 – Set Pricing Program and a FiT 50 – Competitive Pricing Program, which bundles Beacon Solar and Local Solar. The FiT 50 - Competitive Pricing Program is an innovative program that combines both a FiT local solar agreement committing to a large block of approximately 10mw, together with a commitment to a large utility scale project of approximately 50 mw to be built by the same vendor at LADWP's

⁵¹ California Energy Commission, 2015 Integrated Energy Policy Report.

⁵² 2017 Power SLTRP: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc;jsessionid=GRTQcCDJNj21nbZ7VjpxhmQ7R1Jnqh7f24NNn20q34dDSz8v1W2M!1805156640?_adf.ctrl-state=12do6zwhm2_33&_afLoop=692892870477547&_afWindowMode=0&_afWindowId=null#%40%3F_afWindowId%3Dnull%26_afLoop%3D692892870477547%26_afWindowMode%3D0%26_afWindowId%3D155nsya0z1_4, accessed September 30, 2019.

Beacon Solar site.⁵³ This SLTRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. The overriding purpose is to provide a framework to assure the future energy needs of LADWP customers are met in a manner that balances the following key objectives: superior reliability and supply of electric service; competitive electric rates consistent with sound business principles; and responsible environmental stewardship exceeding all regulatory obligations.⁵⁴

LADWP Rules Governing Water and Electric Service

Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.⁵⁵ LADWP will provide a dependable supply of potable water, from available sources, in quantities adequate to meet the reasonable needs of its customers. The delivery of such supply will be at the Service Connection. Generally, the LADWP will maintain operating pressures at the Service Connection of not less than 25 pounds per square inch. Pressures may be lower at times of Maximum Demand or because of unusual elevations or other special conditions.

City of Los Angeles Green Building Code

The LA Green Building Code is based on the California Green Building Standards Code and commonly known as CALGreen as discussed above, which was developed and mandated by the State to attain consistency among the various jurisdictions within the State with the specific goals to reduce a building's energy and water use, reduce waste, and reduce the carbon footprint. The following types of projects are subject to the LA Green Building Code:

- All new buildings (residential and non-residential)
- All additions (residential and non-residential)
- Alterations with building valuations over \$200,000 (residential and non-residential)

Specific measures to be incorporated into the Project to the extent feasible could include, but are not limited to:

- Recycling of asphalt, concrete, metal, wood and cardboard waste generated during demolition and construction;
- Installation of a "cool roof" that reflects the sun's heat and reduces urban heat island effect;
- Use of recycled construction materials, including recycled steel framing, crushed concrete

54 2017 Power SLTRP: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc;jsessionid=GRTQcCDJNj21nbZ7VjpxhmQ7R1Jnqh7f24NNn20q34dDSz8v1W2M!1805156640?_adf.ctrl-state=12do6zwhm2_33&_afLoop=692892870477547&_afWindowMode=0&_afWindowId=null#%40%3F_afWindowId%3Dnull%26_afLoop%3D692892870477547%26_afWindowMode%3D0%26_adf.ctrl-state%3D155nsya0z1_4, accessed September 30, 2019.

55 LADWP Rules Governing Water and Electric Service: <https://www.lacity.org/your-government/government-information/city-charter-rules-and-codes>

- sub-base in parking lots, fly ash-based concrete and recycled content in joists and joist girders when feasible;
- Use of locally (within 500 miles) manufactured construction materials, where possible;
- Use of energy efficient lighting;
- Use of Energy Star appliances in residential units;
- Use of high energy efficiency rooftop heating and conditioning systems;
- 15% of the roof area set aside for future solar panels;
- Use of ultra-low-flow toilets and low-flow metered hand-wash faucets in public facilities;
- Use of smart irrigation systems to avoid over-watering of landscape;
- Use of indigenous and/or water-appropriate plants in landscaping;
- Use of low-impact development measures using innovative design to filter and infiltrate stormwater runoff and reduce water sent to stormdrain systems; and
- Provision of electric vehicle charging stations in the parking structure; 5% of total spaces will be designated for low emitting, fuel efficient and carpool/van pool vehicles.

Los Angeles Department of Water and Power

The LADWP provides electricity to the Project Site. The LADWP provides its 1.5 million customers with more than 26 million megawatt hours (mw-h) of electricity a year.⁵⁶ LADWP serves a 465-square-mile area and is the largest municipal utility in the nation. In total, LADWP operates 21 receiving stations and 160 distribution stations and plans to acquire additional facilities as their load increases.

Table 5.6-1, LADWP Electricity Capacity, shows the LADWP electricity system capacity.

Table 5.6-2, Energy Sales and Peak Demand, provides the estimated sales (consumption) by sector (residential, commercial, industrial, etc.) and peak demand over the next 10 years.

Table 5.6-1
LADWP Electricity Capacity

	Amount (megawatts)
Net Maximum Plant Capacity	7,880
Los Angeles Peak Demand	6,502

56 LADWP, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent?_adf.ctrl-state=na2o8wvza_4&_afLoop=81976737428000, March 23, 2020.

Source: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures.jsessionid=p5VSdTcQnDgy0rGq2JGRDZVphY4Mm2T7p2P1xfvS8qDjzynn2n89!-1074739049?_afLoop=408587084332655&_afWindowMode=0&_afWindowId=null#%40%3F_afWindowId%3Dnull%26_afLoop%3D408587084332655%26_afWindowMode%3D0%26_adf.ctrl-state%3Dj2v8palzl_4
As of August 31, 2017, the latest available figures.
Table: CAJA Environmental Services, March 2020.

Table 5.6-2
Energy Sales and Peak Demand

Year	Sector Sales (gw-h)						Peak Demand (mw)
	Residential	Commercial	Industrial	Misc.	PHEV	Total	
2020-21	8,013	12,059	1,806	269	345	22,492	5,872
2021-22	8,046	12,056	1,813	270	428	22,613	5,889
2022-23	8,088	12,118	1,818	271	508	22,802	5,993
2023-24	8,140	12,215	1,820	271	587	23,033	5,976
2024-25	8,201	12,339	1,823	272	650	23,286	6,029
2025-26	8,258	12,462	1,828	273	716	23,537	6,076
2026-27	8,327	12,602	1,833	273	771	23,807	6,129
2027-28	8,399	12,742	1,838	274	826	24,078	6,182
2028-29	8,472	12,881	1,842	275	872	24,341	6,239

gw-h – gigawatt-hours; mw – megawatts
Misc. includes streetlighting, Owens Valley, and intra-departmental
LADWP, 2017 SLTRP, Appendix A, https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc.jsessionid=GRTQcCDJNj21nbZ7VjpxhmQ7R1Jnqh7f24NNn20q34dDSz8v1W2M!1805156640?_adf.ctrl-state=12do6zwhm2_33&_afLoop=692892870477547&_afWindowMode=0&_afWindowId=null#%40%3F_afWindowId%3Dnull%26_afLoop%3D692892870477547%26_afWindowMode%3D0%26_adf.ctrl-state%3D155nsya0z1_4
Table: CAJA Environmental Services March 2020.

Power and Energy

When discussing electricity, the appropriate unit of measurement depends on whether one is referring to power or energy. Power is the rate at which energy is consumed (in watts, kilowatts, or megawatts). Energy is the amount of power consumed (in watt-hours). Customers are charged based on their energy use (typically kilowatt-hours). The relationship between power and energy:

- Energy (watt-hours) = power (watts) X time (hours)

For example, a 60-watt light bulb refers to the amount of power the light consumes. If the 60-watt light bulb was on for 12 hours, it would consume 720 watt-hours (or 0.72 kilowatt-hours) of energy.

Load Factor

Load factor represents how consistent the rate of energy usage throughout a given day. A 100 percent load factor means that the same amount of power is used off peak as on peak, so the system is getting full use of its generating resources. A low load factor results in generators being started more often to serve load for a few hours a day, which is not optimum. From the 1990s through 2005, annual system load factors were trending slowly upward, which is a positive

movement. Since 2006, system load factors are trending down. Some of this decline in load factor is due to the fact that much of the historic energy efficiency effort is directed at lighting, which has a higher impact on sales when compared to peak. In the forecast for the future, this downward trend is sustained.⁵⁷

Load factor can be expressed as the ratio of the average load in kilowatts (kw) supplied at a designated period compared to the peak or maximum load in kilowatts occurring in the period. Load factor, in percent, is derived by multiplying the kilowatt-hours (kw-h) in the period by 100 and dividing by the product of the maximum demand in kilowatts and the number of hours in the period.⁵⁸

- Load Factor (%) = (kw-h / hours / kw) X 100%
- Example: Assume a 30-day billing period or 30 days X 24 hours for a total of 720 hours. Assume a customer used 10,000 kw-h and had a maximum demand of 21 kw. The customer's load factor would be 66 percent [(10,000 kw-h / 720 hours / 21 kw)*100].

Natural Gas Supply and Demand

The Southern California Gas Company (SCG), a subsidiary of Sempra Energy and the nation's largest natural gas supplier, distributes natural gas to 19.5 million residential, commercial, and industrial customers throughout southern California, including the Project Site. SCG owns and operates 95,000 miles of gas distribution mains and service lines, gas transmission compressor stations, underground storage facilities, as well as nearly 3,000 miles of transmission and storage pipeline. The total 136.1 billion cubic feet (Bcf) of natural gas storage capacity is divided as follows: 82 Bcf is for core customers, small industrial, and commercial customers; 4 Bcf is for system balancing; and the remaining 49.1 Bcf is available to other customers.⁵⁹ Natural gas service is provided in accordance with SCG's policies and extension rules on file with the California Public Utilities Commission (PUC) at the time contractual agreements are made.

The State produces about 15 percent of the natural gas it uses. The remaining 85 percent is obtained from sources outside of the State, 62 percent from the Southwest and Rocky Mountain area, and 23 percent from Canada. In the last ten years, three new interstate gas pipelines were built to serve California. However, the availability of natural gas is based upon present conditions of gas supply and regulatory policies. As a public utility, SCG is under the jurisdiction of the PUC, but can be affected by the actions of federal regulatory agencies. Should these agencies take any action affecting natural gas supply or the conditions under which service is available, natural gas service would be provided in accordance with those revised conditions.

The 2022 California Gas Report includes projections regarding future demand for natural gas in the Southern California region. **Table 5.6-3, Statewide Total Supplies and Requirements**, shows the anticipated statewide total supplies and requirements for natural gas for 2022 to 2027.

57 LADWP, 2014 IRP, pg 47: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=q463ohn9x_17&_afLoop=1251830725757441, April 14, 2015.

58 Madison Gas and Electric, Glossary for Load Factor: <http://www.mge.com/about/electric/glossary.htm#f>, November 19, 2016.

59 2022 CA Gas Report: https://www.socalgas.com/sites/default/files/Joint_Utility_Biennial_Comprehensive_California_Gas_Report_2022.pdf accessed August 22, 2022.

In 2021 (the latest data available from the 2022 California Gas Report), SCG's highest winter sendout was 3,837 million cf/day and highest summer sendout was 2,827 million cf/day.⁶⁰

Table 5.6-3
Statewide Total Supplies and Requirements

	2022	2023	2024	2025	2026	2027
Utility Supply Source						
Statewide Supply Source Total	5,837	5,842	5,734	5,684	5,713	5,376
Utility Requirements						
Statewide Requirements Total	5,376	5,307	5,326	5,246	4,987	5,565
All measurements in million cf per day. Numbers in the table may not add up exactly due to rounding. Average temperature and normal hydro year. 2022 California Gas Report: https://www.socalgas.com/sites/default/files/Joint_Utility_Biennial_Comprehensive_California_Gas_Report_2022.pdf Table: CAJA Environmental Services, August 2022.						

The SCG capacity for 2022 to 2026 are shown in **Table 5.6-4**. As shown, there is available capacity greater than the total throughput.

Table 5.6-4
SCG Natural Gas Capacity

	2022	2023	2024	2025	2026
Total Capacity Available	3,435	3,435	3,435	3,435	3,435
Total Throughput	2,440	2,415	2,327	2,280	2,251
All measurements in million cf/day 2022 California Gas Report: https://www.socalgas.com/sites/default/files/Joint_Utility_Biennial_Comprehensive_California_Gas_Report_2022.pdf Table: CAJA Environmental Services, August 2022.					

Methodology

Annual consumption of electricity (including electricity usage associated with the supply and conveyance of water) and natural gas was calculated using demand factors provided in CalEEMod. Energy impacts associated with transportation during operation were also assessed. The 2016 Title 24 standards, which went into effect on January 1, 2017 are 28 percent more efficient than the 2013 Title 24 standards for residential construction and five percent more efficient for non-residential construction and are included in CalEEMod version 2016.3.2. The 2022 standards are now in effect and even more efficient than the 2016 ones.

Alternative Energy Discussion

The use of energy provided by alternative (i.e., renewable) resources, off-site and on-site, to meet the Project's operational demands is constrained by the energy portfolio mix managed by

⁶⁰ 2022 CA Gas Report:
https://www.socalgas.com/sites/default/files/Joint_Utility_Biennial_Comprehensive_California_Gas_Report_2022.pdf accessed August 22, 2022.

LADWP, the service provider for the Project Site, and limitations on the availability or feasibility of on-site energy generation. LADWP is required to commit to the use of renewable energy sources for compliance with the California Renewable Energy Resources Act, as defined in its 2013 Renewables Portfolio Standard Policy and Enforcement Program. LADWP has committed to meeting the requirement to procure at least 33 percent of their energy portfolio from renewable sources by 2020 through the procurement of energy from eligible renewable resources, to be implemented as fiscal constraints, renewable energy pricing, system integration limits, and transmission constraints permit. Eligible renewable resources are defined in the 2013 Renewable Portfolio Standard to include biodiesel; biomass; hydroelectric and small hydro (30 MW or less); Los Angeles Aqueduct hydro power plants; digester gas; fuel cells; geothermal; landfill gas; municipal solid waste; ocean thermal, ocean wave, and tidal current technologies; renewable derived biogas; multi-fuel facilities using renewable fuels; solar photovoltaic; solar thermal electric; wind; and “other renewables that may be defined later”.⁶¹ LADWP’s target procurement of energy from renewable resources was 20 percent by 2010.

With respect to on-site renewable energy sources, because of the Project’s location, there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydro, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Geothermal energy, the use of heat naturally present in shallow soil or in groundwater or rock to provide building heating/cooling and to heat water, requires the installation of a heat exchanger consisting of a network of below-ground pipes to convey heated or cooled air to a building. Although methane is a renewable derived biogas, it is not available on the Project Site in commercially viable quantities or form (i.e., a form that could be used without further treatment), and its extraction and treatment for energy purposes would result in secondary impacts; it is currently regulated as a hazardous material by the City through its Methane Code.

The City’s Green Building Code discusses renewable energy (Section 99.04.211):

99.04.211.4. Solar Ready Buildings [N]. Buildings for which plans were submitted to the Department for plan check and the plan check fee was paid after the effective date of the 2013 California Energy Code (Title 24, Part 6) shall comply with the following:

1. All one- and two-family dwellings, shall comply with Section 110.10(b)1A, 110.10(b)2, 110.10(b)3, 110.10(b)4, 110.10(c), 110.10(d) and 110.10(e) of the California Energy Code (Title 24, Part 6).
2. All buildings, other than one- and two-family dwellings, shall comply with Section 110.10(b) through 110.10(d) of the California Energy Code (Title 24, Part 6).

99.04.211.5. Space for Future Electrical Solar System Installation [N]. Buildings for which plans were submitted to the Department for plan check and the plan check fee was paid prior to the effective date of the 2013 California Energy Code (Title 24, Part 6), shall provide a minimum of 250 square feet of contiguous unobstructed roof area for the

61 City of Los Angeles, Department of Water and Power, Renewables Portfolio Standard Policy and Enforcement Program, amended December 2013.

installation of future solar photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.

Finally, solar and wind power represent variable-energy, or intermittent, resources that are generally used to augment, but not replace, natural gas-fired energy power generation, since reliability of energy availability and transmission is necessary to meet demand, which is constant. Wind-powered energy is not viable on the Project Sites due to the lack of sufficient wind in the Los Angeles basin. The California Energy Commission (CEC) studied the State's high wind resource potential.⁶² Based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential. Wind resource areas with winds above 12 mph within Los Angeles County are located in relatively remote areas in the northwestern portion of the County. Additionally, there are no viable sites within the Project Site for placement and operation of a wind turbine. The CEC has identified areas within the State with high potential for viable solar, wind, and geothermal energy production. The CEC rated California's solar potential by county using insolation values available to typical photovoltaic system configurations, as provided by the National Renewable Energy Laboratory. Although Los Angeles as a County has a relatively high photovoltaic potential of 3,912,346 megawatt-hours (MWh)/day, inland counties such as Inyo (10,047,177 MWh/day), Riverside (7,811,694 MWh/day), and San Bernardino (25,338,276 MWh/day) are more suitable for large-scale solar power generation.⁶³ In addition, most of the high potential areas of greater than 6 KWh/sqm/day in Los Angeles County are concentrated in the northeastern corner of the county around Lancaster, approximately 45 miles away from the Project Site.

Project Impacts

Construction

As shown in **Table 5.6-5** approximately 74,777 kWh of electricity, 57,662 gallons of gasoline, and 42,564 gallons of diesel are estimated to be consumed during Project construction.

Table 5.6-5
Summary of Energy Usage During Construction

Energy Type	Quantity
Electricity	
Water Consumption	17,523 kWh
Lighting, equipment and other construction activities needing power	57,254 kWh
Total Electricity	74,777 kWh
Transportation - Gasoline	
On-Road Construction Equipment (Worker)	57,662 gallons
Off-road Construction Equipment	0
Total Gasoline	57,662 gallons
Transportation - Diesel	
On-Road Construction Equipment (Vender + Haul)	16,134 gallons
Off-road Construction Equipment (Equipment)	26,430 gallons

62 California Energy Commission. California Wind Resource Potential, http://www.energy.ca.gov/maps/renewable/Wind_Potential.pdf.

63 California Energy Commission, California Solar Resources, April 2005, <http://www.energy.ca.gov/2005publications/CEC-500-2005-072/CEC-500-2005-072-D.PDF>.

Total Diesel	42,564 gallons
Water application rate= 3,020 gal/acre/day kWh equivalent= 0.009727 kWh 1) Gallons per year of water usage for dust control is calculated based on a minimum control efficiency of 66% (three times daily) with an application rate of 3,020 gal/acre/day (Air & Waste Management Association Air Pollution Engineering Manual (1992 Edition)) and average of 25 construction days per month. 2) CalEEMod Default: Each gallon of delivered potable water in Southern California is associated with 0.009727 kWh of electricity). Detailed calculations in Appendix D to the SCEA.	

The Project would have short-term construction impacts, as construction activities would consume relatively minor quantities of electricity (i.e., temporary use for lighting and small power tools). Approximately 74,777 kWh of electricity⁶⁴ would be consumed during the conveyance of the water used during construction activities that require the use of water to control fugitive dust. Furthermore, electricity used to provide temporary power for lighting electronic equipment inside temporary construction trailers and within the proposed structures would be consumed during Project construction. This electricity would be supplied to the Project Site by LADWP and would be obtained from the existing electrical lines that connect to the Project Site. Electricity consumed during Project construction would be temporary and would cease upon the completion of construction, as well as vary depending on site-specific operations and the amount of construction occurring at any given time. Overall, construction activities associated with the Project would require limited electricity generation that would not be expected to have an adverse impact on available electricity supplies. Therefore, electricity impacts during construction would be less than significant.

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. According to CARB's EMFAC Web Database, Los Angeles County on-road transportation sources are expected to consumed 3.975 billion gallons of gasoline and 0.643 billion gallons of diesel fuel in 2020.⁶⁵ For comparison purposes, the fuel usage during Project construction would represent approximately 0.0003 percent of the 2020 annual on-road gasoline-related energy consumption and 0.01 percent of the 2020 annual diesel fuel-related energy consumption in Los Angeles County. Further, while construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and cease upon the completion of construction. Therefore, construction-related impacts to petroleum fuel consumption would be less than significant.

Energy Conservation

The Project would utilize construction contractors who demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to

64 Calculation included in the appendices to this SCEA and based on AQ CalEEMod modeling data and assumptions on construction provided in the Project Description.

65 California Air Resources Board, EMFAC2017 Web Database, www.arb.ca.gov/emfac/2017/, accessed March 2020.

reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h))⁶⁶ to reduce NOX, PM10, and PM2.5 emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023. In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014 and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities, as previously stated.

Operation

As shown in **Table 5.6-6**, the Project's new energy demand would be approximately 1,486 MWh of electricity per year, 2.6 million cubic feet of natural gas per year, 77,501 gallons of gasoline per year, and 19,329 gallons of diesel fuel per year.

**Table 5.6-6
Summary of Energy Usage During Operation**

Land Use	Total
Electricity in kWh per year	
Building	1,390,793
Water	95,041
Total Electricity	1,485,834
Natural Gas in cf per year	
Total Natural Gas	2,648,194¹
Transportation Petroleum-Based Fuel in gallons	
Gasoline	77,501
Diesel	19,329
Total	96,830
kWh = kilowatt-hour kBTU = 1,000 British thermal units ¹ The conversion of kBTU to cubic feet (cf) uses the following factor: 1 cf = 1.037 kBTU Electricity and natural gas use is estimated from CalEEMod 2016.3.2 model sheets, included as Appendix B to the SCEA. Transportation fuel is estimated based on VMT calculation from CalEEMod 2016.3.2 model sheets, included as Appendix D to the SCEA. .Table: CAJA Environmental Services, July 2020.	

66 California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, <http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf>.

Electricity Demand

Electrical conduits, wiring and associated infrastructure would be conveyed to the Project from existing LADWP lines in the surrounding streets to the Project during construction. The Project could likely require transformer vaults, which are common for buildings of its size. However, the construction of these vaults is part of the overall building construction and would not constitute unusual or unplanned infrastructure that would cause a significant impact on the environment.

Currently, the LADWP is able to supply over 7,640 mw of generation capacity with the highest recorded peak being 6,396 mw.⁶⁷ Peak demand is expected to grow from 5,881 mw in 2018-2019 (baseline year) to 5,976 mw in 2023-2024 (future operation year).⁶⁸ Despite these growth projections, they would still not exceed the existing capacity of 7,880 mw. The Project-related net increase in annual electricity consumption of 1,486 MWh per year would represent approximately 0.01 percent of LADWP's projected sales in 2024. Thus, there is adequate supply capacity to serve the Project. Therefore, the LADWP's current and planned electricity supplies would be sufficient to support the Project's electricity consumption.

The Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the LADWP. The 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.⁶⁹ It should also be noted that the Project's estimated electricity consumption is based on usage rates that do not account for the 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 Project would likely be lower than that forecasted. Based on the above analysis, no operational impacts associated with the consumption of electricity would occur.

Natural Gas Demand

The natural gas demand is based on natural gas usage rates from the SCAQMD and without taking credit for the Project's energy conservation features, which would reduce natural gas usage. The approximate demand is based on the best available data and is intended to provide an analysis of the estimated demand in comparison to SCG's overall supply. The SCG capacity by 2024 (future operation year) is estimated at 3,435 million cf/day. The Project's natural gas demand represents approximately 0.002 percent of the capacity available. Thus, there is adequate supply capacity and no impacts would occur.

The Project would be responsible for paying connection costs to connect its on-site service meters to existing infrastructure. SCG undertakes expansion and/or modification of the natural gas

67 LADWP https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=12do6zwhm2_4&_afLoop=86275907941327, accessed May 12, 2017.

68 2017 Power Strategic Long-Term Resource Plan, Appendix A, Load Forecasting: https://www.ladwp.com/ladwp/faces/wcnave/externalld/a-p-doc?_adf.ctrl-state=hzh17ej_4&_afLoop=49898701833644

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

infrastructure to serve future growth within its service area as part of the normal process of providing service. There would be no disruption of service to other consumers during the installation of these improvements. The Project would not result in the construction of natural gas facilities (i.e., distribution lines) that would cause significant environmental impacts. As such, no impacts on natural gas infrastructure would occur.

LADWP and SCG undertake system expansions and secure the capacity to serve their service areas and take into consideration general growth and development. Project operation would result in the irreversible consumption 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 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, compliance with the Green Building Ordinance, adequate projected supply and the obligation of SCG to service the Site, Project impacts related to natural gas would be less than significant.

The Project will implement all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the Project's energy use.

The Project will comply with City Ordinance No. 179,820 (Green Building Ordinance), which establishes a requirement to incorporate green building practices into projects that meet certain threshold criteria.

The Project will comply with the lighting power requirements in the California Energy Code, California Code of Regulations (CCR), Title 24, Part 6.

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

Transportation Energy Demand

The Project's location takes advantage of existing transportation alternatives in the vicinity that could reduce energy (gasoline, electric, or natural gas, depending on the mode of travel) consumption for transportation needs. A number of bus routes are within reasonable walking distance (less than one-quarter mile) of the Project Site. As such, the Project Site is located in proximity to numerous Metro bus routes, thereby providing access for employees, patrons, and residents of the Project Site. These services provide an alternative to driving individual vehicles both into the Project Site from the surrounding areas as well as for residents, guests, and visitors at the Project Site to travel to surrounding areas. The increases in land use diversity and mix of uses on the Project Sites would reduce vehicle trips and vehicle miles travelled by encouraging walking, bicycling, and other nonautomotive forms of transportation, which would result in corresponding reductions in energy demand. Regarding bicycling, the Project would provide bicycle parking spaces at least to the City's Bicycle Parking Ordinance.

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the state's total transportation fuel consumption.

Based on the Project's estimated 2,298,770 vehicle miles traveled (VMT)⁷⁰, and assuming the Project's mix of vehicle types (automobiles, trucks, and motorcycles), approximately 104,260 gallons of fuel would be required in a year. By comparison, California consumes approximately 26 billion gallons of fuel per year. The anticipated increase in consumption associated with one year of Project operation is 0.00001 percent of the statewide use.

Additionally, alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by visitors to the Project Site would reduce the Project's consumption of gasoline and diesel. Impacts related to petroleum consumption, during operation of the Project, would be less than significant.

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

Less Than Significant Impact.

The Project would be designed to comply with all applicable state and local codes, including the City's Green Building Ordinance and the California Green Building Standards Code. Design features that could be implemented would include, but not be limited to, use of efficient lighting technology; energy efficient heating, ventilation and cooling equipment; and Energy Star rated products and appliances. In addition, the Project would incorporate a variety of water conservation features required by the LAMC that would also promote energy conservation.

Overall, the Project would be designed and constructed in accordance with applicable state and local green building standards that would serve to reduce the energy demand of the Project. In addition, based on the above, the Project's energy demand would be within the existing and planned electricity and natural gas capacities of LADWP and SCG, respectively. Use of petroleum-based fuels during construction and operation would also be minimized.

The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

Buildout of the Project, and related projects, would cumulatively increase the demand for energy. However, the Project would be consistent with growth expectations for the region utilized by energy providers to manage power generation and other facilities. As the Project is consistent with these forecasts, it would not make a considerable contribution to cumulative impacts on energy systems.

70 Transportation Assessment, Overland, May 2020. Daily VMT x 365 days.

VII. GEOLOGY AND SOILS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i.	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii.	Strong seismic ground shaking?	☐	☐	☒	☐
iii.	Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv.	Landslides?	☐	☐	☐	☒
b.	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c.	Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒
f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

The section is based the following items, included as **Appendix F** of this SCEA:

F-1 Geotechnical Evaluation, Geotechnologies, Inc., March 26, 2020.

F-2 Approval Letter, Los Angeles Department of Building and Safety, April 15, 2020.

F-3 Paleontology Resources, Natural History Museum, July 16, 2020.

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

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

Less Than Significant Impact.

Based on criteria established by the California Division of Mines and Geology (CDMG), now called California Geologic Survey (CGS), faults may be categorized as active, potentially active, or inactive. Active faults are those which show evidence of surface displacement within the last 11,000 years (Holocene-age). Potentially active faults are those that show evidence of most recent surface displacement within the last 1.6 million years (Quaternary-age). Faults showing no evidence of surface displacement within the last 1.6 million years are considered inactive for most purposes, with the exception of design of some critical structures. Surface rupture is defined as surface displacement which occurs along the surface trace of the causative fault during an earthquake. Buried thrust faults are faults without a surface expression but are a significant source of seismic activity. They are typically broadly defined based on the analysis of seismic wave recordings of hundreds of small and large earthquakes in the southern California area.

In 1972, the Alquist-Priolo Special Studies Zones Act (now known as the Alquist-Priolo Earthquake Fault Zoning Act) was passed into law. The Act defines “active” and “potentially active” faults utilizing the same aging criteria as that used by the CGS, described above. However, established State policy has been to zone only those faults which have direct evidence of movement within the last 11,000 years.

The Project Site is located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Los Angeles.

The Site is not located within an Alquist-Priolo Earthquake Fault Zone.⁷¹

The Site is not located within a City of Los Angeles Preliminary Fault Study Area.⁷²

The Site is not located within an “Earthquake Fault Zone”.⁷³

The closest active fault is the Northridge Fault, located 2.9 miles from the Site. No known active faults cross or project toward the Site.

The proposed structures are designed and constructed in conformance with current building codes and engineering practices. Based upon the Site exploration, laboratory testing, and research the construction of the Proposed Building and Parking Building are considered feasible from a geotechnical engineering standpoint provided the advice and recommendations presented in the Geotechnical Evaluation are followed and implemented during construction.⁷⁴

Accordingly, with the design and construction of the Project in conformance with the California Building Code seismic standards and approval by the LADBS, the Project would not expose people or structures to substantial adverse effects associated with fault rupture, caused in whole or in part by the Project's exacerbation of the existing environmental conditions. Therefore, impacts would be less than significant.

⁷¹ ZIMAS search: <http://zimas.lacity.org/>.

⁷² Navigate LA, Geotechnical Layer: <http://navigate.la.lacity.org/navigate/>.

⁷³ Geotechnical Evaluation, Geotechnologies, Inc., March 26, 2020.

⁷⁴ Geotechnical Evaluation, Geotechnologies, Inc., March 26, 2020.

(ii) Strong seismic ground shaking?

Less Than Significant Impact.

The principal seismic hazard to the Project Site and Project is strong ground shaking from earthquakes produced by local faults. Modern, well-constructed buildings are designed to resist ground shaking through the use of shear panels, moment-resisting frames and reinforcement. Additional precautions may be taken to protect personal property and reduce the chance of injury, including strapping water heaters and securing furniture and appliances. It is likely that the Project Site will be shaken by future earthquakes produced in southern California.

The California State Legislature enacted the Seismic Hazards Mapping Act of 1990, which was prompted by damaging earthquakes in California, and was intended to protect public safety from the effects of strong ground shaking, liquefaction, landslides, and other earthquake-related hazards. The Seismic Hazards Mapping Act requires that the State Geologist delineate various “seismic hazards zones.” The maps depicting the zones are released by the California Geological Survey. The Seismic Hazards Mapping Act does not require mitigation to a level of no ground failure and/or no structural damage.

As with most locations in southern California, there is a considerable potential for strong seismic shaking at the Project Site. The Project structures would be designed in accordance with seismic parameters contained in the City of Los Angeles and California Building Code. The design and construction of the Project is required to comply with the most current codes regulating seismic risk, including the California Building Code and the LAMC, which incorporates the International Building Code (IBC). Compliance with current California Building Code and LAMC requirements will minimize the potential to expose people or structures to substantial risk or loss or injury.

The Site is not within an earthquake fault zone or seismic hazards zone.⁷⁵

The Project will comply with site-specific ground motion values and seismic design criteria provided in the Geotechnical Evaluation. Therefore, impacts would be less than significant.

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

No Impact.

Liquefaction is a phenomenon in which saturated silty to cohesion-less soils below the groundwater table are subject to temporary loss of strength due to buildup of excess pore pressure during cyclic loading conditions such as those induced by an earthquake. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

The Site is not within a liquefaction zone.⁷⁶

⁷⁵ CA Department of Conservation: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>

⁷⁶ CA Department of Conservation: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>

According to ZIMAS mapping system, the Project Site is not classified within an area susceptible to liquefaction.⁷⁷

According to the General Plan Safety Element, the Project Site is not within a liquefaction area.⁷⁸

According to the Geotechnical Evaluation, the Site is not located in an area designated as liquefiable.⁷⁹

Therefore, no impacts would occur.

(iv) Landslides?

No Impact.

A landslide area is land identified by the State of California that is located in the general area of sites that possess the potential for earthquake-induced rock falls, slope failure, and debris flow. The Project Site is not located within a mapped landslide area. No significant slopes are located near the Project Site.

The Site is not within a landslide zone.⁸⁰

According to ZIMAS mapping system, the Project Site is not within a landslide area.⁸¹

The General Plan Safety Element does not identify any area around the Project Site as a bedrock or probable bedrock landslide area.⁸²

Therefore, no impacts would occur.

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

Less Than Significant Impact.

Demolition of the existing surface parking lot and grading would expose soils for a limited time, allowing for possible erosion. However, due to the temporary nature of the soil exposure during the grading process, substantial erosion is unlikely to occur.

All grading activities require permits from LADBS, which reviews compliance with requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading and Site preparation will comply with all applicable provisions of LAMC Chapter IX, Division 70, addressing grading, excavation, and fills. The grading plan will conform with the City's Landform Grading Manual guidelines, subject to approval by the Department of City Planning and the LADBS' Grading Division.

77 ZIMAS search: <http://zimas.lacity.org/>.

78 Los Angeles Safety Element, 2021 Update: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, August 23, 2022.

79 Geotechnical Evaluation, Geotechnologies, Inc., March 26, 2020.

80 CA Department of Conservation: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>

81 ZIMAS search: <http://zimas.lacity.org/>.

82 Los Angeles Safety Element, 2021 Update: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, August 23, 2022.

During construction, the Project will be required to prevent the transport of sediments from the Site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). Appropriate erosion control and drainage devices per the LAMC Section 91.7013 shall be provided to the satisfaction of the LADBS. Therefore, construction impacts would be less than significant.

Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil. The entire Project Site would be covered by the proposed structures; thus, no exposed areas subject to erosion would be created or affected by the Project. Therefore, operation impacts would be less than significant.

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

Less Than Significant Impact.

Construction activities associated with the Project must comply with the City of Los Angeles Building Code, which is designed to assure safe construction, including building foundation requirements appropriate to site conditions.

Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. The Project Site is not located within an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the Project Site or in the general Project Site vicinity. There appears to be little or no potential for ground subsidence due to withdrawal of fluids or gases at the Site.

As discussed in the response to Questions VI(a)(iii) and VI(a)(iv), the Project Site is not at risk for liquefaction or landslides.

Seismically-induced settlement or compaction of dry or moist, cohesion-less soils can be an effect related to earthquake ground motion. Such settlements are typically most damaging when the settlements are differential in nature across the length of structures.

Based upon the Site exploration, laboratory testing, and research the construction of the Proposed Building and Parking Building are considered feasible from a geotechnical engineering standpoint provided the advice and recommendations presented in the Geotechnical Evaluation are followed and implemented during construction.⁸³

Therefore, impacts would be less than significant.

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

⁸³ Geotechnical Evaluation, Geotechnologies, Inc., March 26, 2020.

Less Than Significant Impact.

Expansive soils contain significant amounts of clay, which may expand or shrink with moisture variations.

Groundwater was not encountered on the Site to 90 feet below Site grade. Based upon the Site exploration, laboratory testing, and research the construction of the Proposed Building and Parking Building are considered feasible from a geotechnical engineering standpoint provided the advice and recommendations presented in the Geotechnical Evaluation are followed and implemented during construction.⁸⁴

Construction of the Project would be required to comply with the City of Los Angeles Uniform Building Code, LAMC, and other applicable building codes which includes building foundation requirements appropriate to Site-specific conditions.

Therefore, impacts would be less than significant.

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

No Impact.

This question would apply to the Project only if it were located in an area not served by an existing sewer system. The Project Site is located in an urbanized area within the City of Los Angeles, which is served by a wastewater collection, conveyance, and treatment system operated by the City. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impact would occur.

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

Less Than Significant Impact.

The Project Site does not contain any unique geological features. The Project Site, located in an urbanized area, has been previously disturbed by past development activities and contains an existing building and surface parking lot. The Project would require excavation for mechanical uses, utility and foundation work, and grading. There are no known paleontological resources at the Project Site.⁸⁵

The Natural History Museum does not have any vertebrate fossil localities that lie directly within the Project boundaries, but does have localities nearby from the same sedimentary deposits that occur at depth in the Project area.

⁸⁴ Geotechnical Evaluation, Geotechnologies, Inc., March 26, 2020.

⁸⁵ City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Section 2.15, Figure CR-2, Vertebrate Paleontological Resources in the City of Los Angeles: <https://planning.lacity.org/odocument/6aa45676-e431-43ab-8621-dd493e64d2ea/FrameworkFEIR.pdf>, accessed August 23, 2022.

If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety will be notified immediately, and all work will cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Therefore, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

Impacts associated with geologic and soil issues are typically confined to individual project sites or within a very localized area because of site-specific conditions. Related projects would be subject to established guidelines and building code regulations and construction procedures pertaining to seismic hazards. The Los Angeles Building Code would require consideration of seismic design for all related projects. Related projects would be required to implement LAMC regulations for grading and excavations during construction, including SWPPP and LID requirements. In addition, the related project sites are located in a highly urbanized area and would connect to existing wastewater infrastructure. Thus, the related projects would not need to use septic tanks or alternative waste disposal systems.

The Project and related projects would be required to comply with guidelines and building code regulations pertaining to seismic hazards and with approved geotechnical recommendations, risks associated with seismic rupture, lateral spreading, subsidence, liquefaction, or collapse would also be less than significant.

Some related projects would require excavation that could potentially expose or damage potential paleontological resources. However, the related projects are located in developed urban areas with sites that have been previously disturbed, and the potential to encounter and cause a significant impact on surface resources is unlikely. Further, California Public Resources Code Section 21083.2 would protect undiscovered paleontological resources. Thus, the Project's contribution to cumulative impacts would not be cumulatively considerable.

VIII.GREENHOUSE GAS EMISSIONS

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

This section examines the direct and indirect impacts of the Project related to greenhouse gas (GHG) emissions and global climate change. The information and analysis in this section are primarily based on the following technical document (refer to **Appendix B** of this SCEA):

B Air Quality and Greenhouse Gas Emissions Technical Modeling, NTEC, July 2020.

Environmental Setting

Climate Change Background

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and storms. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of GHG emissions in the atmosphere. GHG emissions are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature.

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHG emissions keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit. However, it is believed that excessive concentrations of anthropogenic GHG emissions in the atmosphere can result in increased global mean temperatures, with associated adverse climatic and ecological consequences.

GHG Emissions Background

GHG emissions include CO₂, methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃).⁸⁶ Carbon dioxide is the most abundant GHG. Other GHG emissions are less abundant but have greater global warming potential than CO₂. Thus, emissions of other GHGs are frequently expressed in their equivalent mass of CO₂, denoted as CO₂e. Forest fires, decomposition, industrial processes,

⁸⁶ As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.

landfills, and the consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions.

Regulatory Framework

There are any number of agreements, strategies, policies, regulations, and standards that relate to GHG emissions – from international climate accords to local climate action plans. The following plans, policies, and regulations are fundamental to the Project’s determination of significance with respect to its GHG emissions and consistency with these documents.

State

AB 32 (California Global Warming Solutions Act of 2006) and SB 32

In September 2005, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, AB 32, into law. AB 32 committed the State to achieving the following:

- By 2010, reduce statewide GHG emissions to 2000 levels.⁸⁷
- By 2020, reduce statewide GHG emissions to 1990 levels.

CARB was tasked with determining what the statewide GHG emissions level was in 1990 and approving a statewide GHG emissions limit equivalent to that level, to be achieved by 2020. AB 32 further required CARB to adopt rules and regulations that achieve the maximum technologically feasible and cost-effective GHG emissions reductions. The state achieved its 2020 GHG emissions target of returning to 1990 levels four years earlier than mandated by AB 32.

Signed in September 2016 by Governor Jerry Brown, SB 32 updates AB 32 to include an emissions reductions goal for the year 2030. Specifically, SB 32 requires CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. New goals outlined in SB 32 update AB 32’s scoping plan requirement and involve 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.

It should be noted that the State Legislature has not yet adopted a target for the 2050 horizon year, though Executive Order S-3-05 issued by Governor Arnold Schwarzenegger and Executive Order B-30-15 issued by Governor Jerry Brown each establish a GHG target of 80 percent below 1990 levels for this year.

Climate Change Scoping Plan

In 2008 CARB approved a Climate Change Scoping Plan (AB 32 Scoping Plan) detailing the approach that California would take to reduce its GHG emissions to 1990 levels by 2020, as required by AB 32. To achieve this, CARB determined that an approximate 28.5 percent reduction in GHG emissions would be necessary. That is, projected 2020 GHG emissions (i.e., emissions

⁸⁷ The 2010 target to reduce GHG emissions to 2000 levels was not met.

that would occur in 2020, absent any GHG-reducing laws and regulations) would have to be reduced by 28.5 percent.

However, shortly after the adoption of the 2008 Scoping Plan, a lawsuit was filed challenging CARB's approval of the Climate Change Scoping Plan Functional Equivalent Document (FED to the Climate Change Scoping Plan). In May 2011, it was found that the environmental analysis of this document's alternatives was not sufficient under CEQA. In response to this ruling, CARB prepared a revised and expanded document, the Supplemental FED to the Climate Change Scoping Plan (Supplemental FED), approved in August 2011.

As part of the Supplemental FED, CARB updated the projected 2020 emissions inventory based on then-current economic forecasts (i.e., as influenced by the economic downturn) and GHG emissions reduction measures already in place.⁸⁸ Ultimately, CARB determined that achieving the 1990 emissions levels by 2020 would require a reduction in GHG emissions of 16 percent, down from the previous 28.5 percent figure.

CARB adopted the First Update to the Climate Change Scoping Plan: Building on the Framework (First Update) in 2014. The First Update found that California was on track to meet AB 32's 2020 emissions reduction mandate and determined that, by 2030, the State could reduce its GHG emissions to levels on course with those needed to achieve the 2050 target, if it realizes the expected benefits of its existing policy goals.⁸⁹ CARB further identified and developed recommended actions for six focus areas key to achieving the 2050 target: (1) energy; (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure); (3) agriculture; (4) water; (5) waste management; and (6) natural and working lands. As noted earlier, the State achieved its 2020 target that was established by AB 32.

In response to the passage of SB 32 and the identification of the 2030 GHG reduction target, CARB adopted the 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target (2017 Scoping Plan). The 2017 Scoping Plan builds upon the successful framework established by the 2008 Scoping Plan and the First Update and identifies new, technologically feasible, and cost-effective strategies to ensure that the state meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. It includes policies to require direct GHG reductions at some of the state's largest stationary sources and mobile sources, such as use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade program, which constraints and reduces emissions at covered sources.

CARB's 2030 emissions projections for the State take into account 2020 GHG reduction policies and programs. The 2017 Scoping Plan also addresses GHG emissions from natural and working lands of California, which include the agriculture and forestry sectors. Under the 2017 Scoping Plan scenario, continuation of the Cap-and-Trade regulation (or carbon tax) is expected to cover most of the 2030 reduction obligation – approximately 34 to 79 MMTCO₂. The State's short-lived climate pollutants strategy, which addresses GHGs that remain in the atmosphere for shorter

88 E.g. the million-solar-roofs program, AB 1493 (Pavley I) motor vehicle GHG emissions standards, and the Low Carbon Fuel Standard (LCFS). Pavley I, the first GHG standard in the nation for passenger vehicles, took effect for model years starting in 2009 to 2016. Pavley I could potentially result in a 27.7 million metric tons CO₂e reduction of GHG emissions by 2020. Pavley II covers models years 2017 to 2025 and could result in additional reductions of 4.1 million metric tons CO₂e.

89 The 2050 goal of reducing GHG emissions to 80 percent below 1990 levels was originally established by Executive Order S-3-05, issued by Governor Schwarzenegger in June 2005. However, the 2050 goal was not codified by either AB 32 or SB 32.

periods of time than longer-lived GHGs like CO₂, is expected to cover approximately 17 to 35 MMTCO₂e. The Renewables Portfolio Standard with its goal of 50 percent renewable electricity by 2030 is expected to cover approximately 3 MMTCO₂. The mobile source strategy and sustainable freight action plan are expected to cover approximately 11 to 13 MMTCO₂. CARB also expects that doubling the energy efficiency savings in natural gas and electricity end uses by 2030 would cover approximately 7 to 9 MMTCO₂ of the 2030 reduction obligation. Other strategies would be expected to cover the remaining 2030 reduction obligations.

The 2017 Scoping Plan also addresses the role of local governments in meeting the State's GHG reductions goals, because local governments have jurisdiction and land use authority related to community-scale planning and permitting processes, local codes and actions, outreach and education programs, and municipal operations. Furthermore, local governments may have the ability to incentivize renewable energy, energy efficiency, and water efficiency measures. For individual projects under CEQA, the 2017 Scoping Plan states that local governments can support climate action when considering discretionary approvals and entitlements. According to the 2017 Scoping Plan, lead agencies have the discretion to develop evidence-based numeric thresholds consistent with the Scoping Plan, the State's long-term goals, and climate change science. The City of Los Angeles has not developed per capita GHG targets for 2030 or 2050; however, the City recognizes that GHG emission reductions are necessary in the public and private sectors. The City has taken the initiative in combating climate change by developing programs such as the Green New Deal and Green Building Code.

Cap-and-Trade Program

The Scoping Plans identify the Cap-and-Trade Program as one of the strategies California will employ to reduce GHG emissions. According to CARB, this program will help California meet its eventual goal of achieving an 80 percent reduction from 1990 levels by 2050. Under Cap-and-Trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap are able to trade permits to emit GHGs. CARB designed and adopted the California Cap-and-Trade Program pursuant to its authority under AB 32.

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether that electricity is generated in-state or imported. Accordingly, for projects that are subject to the CEQA, GHG emissions from their electricity consumption are covered by the Cap-and-Trade Program. The program also covers fuel suppliers (e.g., natural gas and propane providers, as well as transportation fuel providers) to address emissions associated with these fuels and their combustion. The Cap-and-Trade Program applies to emissions that encompass approximately 80 percent of the State's GHG emissions. As noted earlier, California achieved its 2020 GHG reduction target four years earlier than mandated. The largest reductions were the result of increased renewable electricity in the electricity sector, which is covered by the Cap-and-Trade Program.

Renewables Portfolio Standard

SB 1078 required retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017 as a Renewables Portfolio Standard (RPS). Subsequent amendments have provided additional targets throughout the years. For example SB 350 further increased the RPS to 50 percent by 2030. It also required the state to double its statewide energy efficiency savings in electricity and

natural gas end uses by 2030. The 2017 Scoping Plan incorporated these standards and estimated that their corresponding GHG reductions would account for approximately 21 percent of the Scoping Plan's reductions. Most recently in September 2017, SB 100 updated RPS targets to 44 percent by 2024, 50 percent by 2026, 60 percent by 2030, and 100 percent by 2045.

Sustainable Communities and Climate Protection Act (SB 375)

SB 375, adopted by the State in September 2008, established mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions, because the transportation sector is the single largest contributor of greenhouse gases of any sector. Under SB 375, CARB – in consultation with the Metropolitan Planning Organizations (MPOs) – is required to set regional GHG reduction targets for passenger vehicle and light-duty truck sectors. These targets must be incorporated within a region's Regional Transportation Plan (RTP), which is a planning document used for long-term transportation planning. SB 375 and its relevance to the regional RTP/SCS is discussed in more detail later in this section.

Senate Bill 743

In 2013 Governor Jerry Brown signed SB 743, which created a process to change the way transportation impacts are analyzed under CEQA. Specifically, SB 743 required the Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to the level of service (LOS) methodology for evaluating transportation impacts. Particularly within areas served by transit, the required alternative criteria must promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. Transportation impact metrics may include vehicle miles traveled (VMT), VMT per capita, automobile trip generation rates, or automobile trips generated.

Title 24, Building Standards Code and CALGreen Code

Part 11 of the Title 24 Building Standards is referred to as the California Green Building Standards (CALGreen) Code. It was developed in part to help the State achieve its GHG reduction goals under AB 32 by codifying standards for reducing building-related energy, water, and resource demand. The purpose of the CALGreen Code is to “improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality.”⁹⁰ The CALGreen Code is not intended to substitute for or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission.

The current 2019 Title 24 Standards went into effect on January 1, 2020. The 2019 Title 24 Standards ensure that builders use the latest energy efficient and energy conserving technologies and construction practices. As described in the 2019 Title 24 Standards, the latest standards represent “challenging but achievable design and construction practices” that represent “a major step towards meeting the Zero Net Energy (ZNE) goal.” Single-family homes built to the 2019 Title 24 Standards are projected to use approximately seven percent less energy than those built

⁹⁰ California Building Standards Commission, 2010 California Green Building Standards Code.

under the 2016 standards. Once rooftop solar electricity generation is factored in, these homes would use about 53 percent less energy than those built under the 2016 standards. Non-residential buildings are projected to use approximately 30 percent less energy than those built under the preceding standards. Compliance with Title 24 is enforced through the building permit process. The 2022 Title 24 Standards went into effect on January 1, 2023.

SB 97

Passed in August 2007, SB 97 required the State Office of Planning and Research (OPR) to prepare and develop CEQA guidelines for the effects and/or mitigation of GHG emissions, including effects associated with transportation and energy consumption. Subsequently, the Draft Guidelines Amendments for Greenhouse Gas Emissions (Guidelines Amendments) were adopted in December 2009 to address the specific obligations of public agencies when analyzing GHG emissions to determine a project's effect on the environment, as pursuant to CEQA.

The Guidelines Amendments provide no thresholds of significance or any specific mitigation measures; rather, they require a lead agency to make a good-faith effort to describe, calculate, or estimate the amount of GHG emissions that would result from a project, to the extent possible based on scientific and factual data. The Guidelines Amendments give discretion to the lead agency whether to (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. Additionally, three factors that should be considered in the evaluation of the significance of GHG emissions are identified as follows:

- (1) The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;
- (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
- (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The administrative record for the Guidelines Amendments also clarifies “that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of CEQA’s requirements for the cumulative impact analysis.”⁹¹

The California Natural Resources Agency is required to periodically update the Guidelines Amendments to incorporate new information or criteria established by CARB pursuant to AB 32. SB 97 applies to any environmental impact report (EIR), negative declaration, mitigated negative declaration, or other document requirement by CEQA.

Regional

⁹¹ Letter from Cynthia Bryant, Director of the Governor’s Office of Planning and Research, to Mike Chrisman, California Secretary for Natural Resources, dated 13 April 2009.

South Coast Air Quality Management District CEQA Guidance

The City of Los Angeles is located in the South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is responsible for air quality planning in the Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles.

In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds.⁹² A GHG Significance Threshold Working Group was formed to further evaluate potential GHG significance thresholds.⁹³ The SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 MTCO₂e per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 MTCO₂e per year would be assumed to have a less than significant impact on climate change. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 MTCO₂e per year for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects). The Working Group has been inactive since 2011, and SCAQMD has not formally adopted any GHG significance thresholds for other jurisdictions.

2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

In September 2008 Governor Arnold Schwarzenegger signed the Sustainable Communities and Climate Protection Act of 2008, also known as SB 375, to align regional planning for housing and transportation with the GHG emissions reduction goals outlined by AB 32. SB 375 requires each MPO to adopt an SCS encouraging compact development that reduces passenger VMT and trips, all for the purpose of meeting CARB-determined regional GHG emissions reduction targets.

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. As the federally designated MPO for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain NAAQS. SCAG is also a co-producer, with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin's AQMP.

CARB set GHG reduction targets of 8 percent by 2020 and 19 percent by 2035 (compared with 2005 levels) for the SCAG region, effective as of October 1, 2018. Adopted on September 3, 2020, SCAG's long-range plan, the 2020-2045 RTP/SCS, serves as the roadmap to fulfilling the region's compliance with these latest GHG emissions reduction targets. To this end, the 2020-2045 RTP/SCS recognizes that transportation investments and future land use patterns are

92 SCAQMD, Board Meeting, December 5, 2008. Agenda No. 31, <http://www3.aqmd.gov/hb/2008/081231.a.thm>. Accessed June 23, 2022.

93 SCAQMD, Greenhouse Gases CEQA Significance Thresholds, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds>. Accessed June 23, 2022.

inextricably linked, and it acknowledges how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region. The 2020-2045 RTP/SCS land use pattern continues the trend of focusing new housing and employment growth in the region's HQTAs and aims to enhance and build out the region's transit network.

HQTAs are a cornerstone of land use planning best practice in the SCAG region, and studies by the California Department of Transportation, the USEPA, and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption. In addition, HQTAs concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability. As a result, HQTAs are vital to the attainment of regional GHG emissions reduction targets: successful implementation of the 2020-2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, reducing automobile use and, crucially, associated GHG emissions. The SB 375 GHG reduction targets for the SCAG region correspond with the achievement of reductions in regional VMT per capita. The OPR has recommended that achieving 15 percent lower per capita (residential) or per employee (commercial) VMT than existing development is generally feasible and is supported by evidence that connects these reductions to the State's emissions goals.

Local

City of Los Angeles Green LA Action Plan/Sustainability pLAn

In 2007 the City addressed the issue of global climate change by releasing *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* ("LA Green Plan/Climate LA"). This document outlined various goals and actions that the City established to reduce the generation and emissions of GHGs from both public and private activities.

In April 2019, the City released the *Green New Deal* (also referred to as the *Sustainable City Plan 2019*). This program contains actions designed to create sustainability-based performance targets through 2050 that are themselves intended to advance economic, environmental, and equity objectives. It is the first four-year update to the City's first "Sustainable City pLAn" that was released in 2015. It augments, expands, and elaborates the City's vision for a sustainable future and tackles climate change with accelerated targets and new aggressive goals.

Though the *Green New Deal* is not a plan adopted solely to reduce GHG emissions, it lists "Climate Mitigation" (i.e., GHG reduction) as one of eight explicit benefits that help define its strategies and goals. Goals that are directly or indirectly linked to climate mitigation include:

- Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.
- Reduce building energy use per square feet for all building types by 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68mBTU/sf in 2015).

- All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.
- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.
- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; 75 percent by 2050.
- Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides, or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.
- Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.
- Increase the percentage of electric and zero emission vehicles in the city to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.
- Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035; and 100 percent by 2050.
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 pounds of waste generated per capita per day in 2011).
- Eliminate organic waste going to landfills by 2028.
- Reduce the urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.
- Ensure the proportion of Angelenos living within ½ mile of a park or open space is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.

City of Los Angeles Green Building Code

In December 2019, the Los Angeles City Council approved Ordinance No. 186,488, which amended Chapter IX of the LAMC, referred to as the Los Angeles Green Building Code, by adding a new Article 9 to incorporate various provisions of the 2019 CALGreen Code. Projects filed on or after January 1, 2020, must comply with the provisions of the Los Angeles Green Building Code.

City of Los Angeles General Plan

The City does not have a General Plan Element specific to climate change and GHG emissions, and its General Plan does not have any stated goals, objectives, or policies that specifically address climate change and GHG emissions. However, the following five goals from the City's General Plan Air Quality Element would have an indirect effect on GHG emissions reductions:

- Less reliance on single-occupancy vehicles with fewer commute and non-work trips.

- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques.
- Minimal impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.
- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures, including passive measures, such as site orientation and tree planting.
- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

Traffic Study Policies and Procedures

The City of Los Angeles Department of Transportation (LADOT) has developed the City Transportation Assessment Guidelines (TAG) (July 2019, updated July 2020) to provide the public, private consultants, and City staff with standards, guidelines, objectives, and criteria to be used in the preparation of transportation assessments. The TAG establishes the reduction of vehicle trips and VMT as the threshold for determining transportation impacts and thus is an implementing mechanism of the City's strategy to reduce land use transportation-related GHG emissions consistent with AB 32, SB 32, SB 375.

Existing Conditions

Existing Statewide GHG Emissions

As reported by the CEC, California contributes approximately one percent of global and 6.4 percent of national GHG emissions.⁹⁴ California contains approximately 12 percent of the national population. CARB reports that in 2019, emissions from GHG emissions statewide were 418 million MT of CO₂e, 7 million MT of CO₂e lower than 2018 levels and nearly 13 million MT of CO₂e below the State's 2020 GHG limit of 431 million MT of CO₂e. Forty-eight percent of the state's total electricity generation (in-state generation plus imported electricity) came from zero-GHG generation sources (e.g., solar, wind, hydropower, nuclear, etc.). Per capita GHG emissions have dropped from a 2001 peak of 14.0 MT per person to 10.5 MT per person in 2019, a 25 percent decrease. The transportation sector remains the largest source of GHG emissions, accounting for almost 40 percent of the State's GHG inventory (though when emissions from extracting, refining, and moving transportation fuels are included, this figure increases to over 50 percent of statewide emissions for 2019).⁹⁵

94 California Energy Commission. Tracking Progress, Greenhouse Gas Emission Reductions. www.energy.ca.gov/renewables/tracking_progress/documents/Greenhouse_Gas_Emissions_Reductions.pdf. Last updated December 2018.

95 CARB, California Greenhouse Gas Emissions for 2000 to 2017. 2019.

Thresholds of Significance

The City has adopted the thresholds set forth in Appendix G of the CEQA Guidelines as project-specific thresholds of significance. Pursuant to the Appendix G thresholds, the Project would have a significant impact with respect to GHG emissions if it would:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Methodology

For the reasons set forth below, to analyze the Project's GHG impacts under these Appendix G thresholds, the City will utilize a qualitative analysis that will assess the Project's consistency with the following plans, policies, and regulations adopted to reduce GHG emissions:

- Executive Order S-3-05 and AB 32;
- AB 32 Scoping Plan and First Update;
- Executive Order B-30-15, SB 32, and the 2017 Scoping Plan;
- SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS, "Connect SoCal");
- City of Los Angeles Mobility 2035 Plan;
- City of Los Angeles Green New Deal; and
- City of Los Angeles Green Building Ordinance

Additionally, to comply with the requirements of CEQA Guidelines, section 15064.4(a), the analysis includes a good faith estimate of GHG emissions that may result from the project.

The basis for this methodology is as follows: The Department of City Planning has adopted Appendix G as its thresholds of significance, and the Appendix G threshold questions for GHG impacts may be analyzed utilizing a qualitative approach. SCAQMD has not adopted GHG significance thresholds for land use development projects such as the Proposed Project, although it has adopted significance thresholds for industrial-type projects for which it is the lead agency. The SCAQMD industrial thresholds are not relevant to the Project, as the only projects for which the SCAQMD serves as the lead agency are those that involve the adoption of air quality rules or regulations, or projects that have not gone through CEQA environmental review via another lead agency. However, the City is the lead agency for this project. The City has not adopted thresholds for land use development projects based on SCAQMD guidance for these types of projects, and the City has the discretion to adopt a significance threshold relevant to the Project.

On November 30, 2015, the California Supreme Court issued an opinion on significance thresholds under CEQA for the evaluation of impacts associated with GHGs in the case *Center*

for Biological Diversity et al. vs. California Department of Fish and Wildlife. The following discussion summarizes the relevant facts and holdings of that case, which assessed the use of qualitative GHG significance thresholds (i.e., those concerning consistency with applicable plans, programs, and policies) and quantitative GHG significance thresholds (i.e., numerical thresholds).

The Court acknowledged that California air pollution control officials and air quality districts have made several proposals for numerical thresholds. Multiple agencies' efforts at framing GHG significance issues have not yet coalesced into any widely accepted set of numerical thresholds, but they have produced a certain level of consensus on the value of AB 32 consistency as a criterion. Neither AB 32 nor the CARB Scoping Plan related thereto set out a mandate or method for CEQA analysis of GHG emissions from a proposed project. An amendment to CEQA adopted in 2007, however, required the preparation, adoption, and periodic update of guidelines for mitigation of GHG impacts. The resulting direction from the State was that a lead agency should attempt to describe, calculate, or estimate the amount of GHG emissions that a project may emit, but recognized that agencies have discretion in how to do so. CEQA Guideline 15064.4 further provides that when assessing the significance of GHG emissions, the agency should consider these factors (among others): (1) the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting; (2) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

The Court also acknowledged that the scope of global climate change and the fact that GHGs, once released into the atmosphere, are not contained in the local area of their emission means that the impacts to be evaluated are global rather than local. For many air pollutants, the significance of their environmental impact may depend greatly on where they are emitted; for GHGs, it does not. As such, GHG concerns are not necessarily locational; they are whether a particular project, which will accommodate California's housing and/or economic development needs, is sustainable. A significance criterion framed in terms of efficiency and conservation in land use (as compared to a business-as-usual [BAU] pattern of growth) is superior to a simple numerical threshold because CEQA is not intended as a population control measure.

Furthermore, the Court stated that this consideration favors consistency with AB 32's statewide goals as a permissible significance criterion for project GHG emissions. Meeting statewide reduction goals does not preclude all new development. Rather, the AB 32 Scoping Plan – which is the State's roadmap for meeting AB 32's GHG reduction target – assumes continued growth and depends on increased efficiency and conservation in land use and transportation from all Californians. To the extent a project incorporates efficiency and conservation measures sufficient to contribute its portion of the overall GHG reductions necessary for the entire state, one can reasonably argue that its impact is not cumulatively considerable, because it would be helping to solve the cumulative problem of GHG emissions as envisioned by California law. Given the reality of growth, some GHG emissions from new housing and commercial developments are inevitable. The critical CEQA question is the cumulative significance of a project's GHG emissions, and, as

discussed previously, from a climate change perspective it does not matter where in the State those emissions are produced. Under these circumstances, evaluating the significance of a project's GHG emissions with respect to their effect on the State's efforts to meet its long-term goals is a reasonable threshold. Accordingly, a significance threshold based on a project's consistency with plans aimed at reducing GHG emissions is permitted under CEQA.

The Supreme Court in *Center for Biological Diversity* recognized potential options for analyzing the cumulative significance of a project's GHG emissions, including:

- Business-as-usual (BAU) Model. BAU comparison based on the Scoping Plan methodology if supported by substantial evidence that the utilized metric supports what level of reduction from BAU a new land use development at the proposed location must contribute to comply with state goals.
- Consistency with AB 32's goal in whole or in part by looking at compliance with regulatory programs designed to reduce GHG; provided the project complies with or exceeds the regulations that were adopted by CARB or state agencies to comply with the Scoping Plan; and provided, the significance analysis only relates to impacts within the area governed by the regulation (for example, reliance on Title 24 energy efficiency rules that are intended to reduce GHG from buildings would not address GHG impacts from transportation). And/or showing consistency with local GHG reduction plans, (e.g., climate action plan), to provide a basis for the tiering or streamlining of project-level CEQA analysis, including as consistent with CEQA Guidelines Section 15183.3.
- Relying on numerical thresholds for significance for GHG emissions.

In 2019 CEQA Guidelines Section 15064.4 was amended to incorporate the holding in the *Center for Biological Diversity* case as well as others. The section now directs lead agencies as follows:

§ 15064.4. Determining the Significance of Impacts from Greenhouse Gas Emissions.

- (a) The determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in section 15064. A lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:
- (1) Quantify greenhouse gas emissions resulting from a project; and/or
 - (2) Rely on a qualitative analysis or performance based standards.
- (b) In determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions. The agency's analysis should consider a timeframe that is appropriate for the project. The agency's analysis

also must reasonably reflect evolving scientific knowledge and state regulatory schemes. A lead agency should consider the following factors, among others, when determining the significance of impacts from greenhouse gas emissions on the environment:

- (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
 - (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
 - (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions (see e.g., section 15183.5(b)). Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project. In determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.
- (c) A lead agency may use a model or methodology to estimate greenhouse gas emissions resulting from a project. The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use.

Based on the above legal standards, the City finds that analyzing the Project's GHG emissions through consistency with the plans, policies, and regulations identified above that have been adopted to reduce GHG emissions is the appropriate methodology to analyze the Project's GHG impacts in the context of the GHG threshold questions set forth in Appendix G.

Using consistency with AB 32's statewide goal for GHG reduction, and subsequently adopted plans, programs, policies, standards, and regulations as identified above, rather than a numerical threshold, as a significance criterion is also consistent with the broad guidance provided by Section 15064.4 of the CEQA Guidelines to reflect that there is no iron-clad definition of significance pertaining to this matter. Section 15064.4 was not intended to restrict agency discretion in choosing a method for assessing GHG emissions, but rather to assist lead agencies in investigating and disclosing all that they reasonably can regarding a project's GHG emissions impact.

The basis for this analysis' estimate of the Project's GHG emissions is as follows: As stated above, CEQA Guidelines Section 15064.4(a) establishes that a lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe and estimate the amount of greenhouse gas emissions resulting from a project. CEQA Guidelines Section 15064.4(c) states a lead agency may use a model or methodology to estimate greenhouse gas emissions resulting from a project and that the lead agency has the discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account a project's incremental contribution to climate change.

Based upon this guidance, GHG emissions associated with the Project's construction and operations were estimated using the California Emissions Estimator Model (CalEEMod). Construction emissions are those that would result from the construction of the Project. Operations emissions include those related to both direct and indirect sources such as mobile sources, water use, solid waste, area sources, natural gas, and electricity use. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professions to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects in California. The City is not required to use a numerical GHG threshold or another methodology that relies on a quantitative analysis. As such, the Project's GHG emissions have been estimated and disclosed to comply with CEQA Guidelines Section 15064.4(a) and to provide evidence that the implementation of the plans, policies, and regulations adopted to reduce GHG emissions will result in actual GHG reductions.

Analysis

Less Than Significant Impact. The Appendix G thresholds questions concerning GHG emissions are addressed together in the following analysis:

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

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

Less Than Significant Impact. Whether the Project would generate GHG emissions that could have a significant impact on the environment is based on whether the Project would conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHG emissions. As such, both of these Checklist Questions are addressed together.

Plan Consistency

The following section assesses the extent to which the Project would be consistent with the following relevant plans, policies, and regulations adopted for the purpose of reducing GHG emissions:

- Executive Order S-3-05 and AB 32;
- AB 32 Scoping Plan and First Update;

- Executive Order B-30-15, SB 32, and the 2017 Scoping Plan;
- SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS, "Connect SoCal");
- City of Los Angeles Mobility 2035 Plan;
- City of Los Angeles Green New Deal; and
- City of Los Angeles Green Building Ordinance

With respect to the two Executive Orders listed above and the legislation that was codified in response to those orders (e.g., AB 32 and SB 32, respectively), CARB's Scoping Plans provide for strategies and programs aimed at achieving the GHG reduction goals in those orders and their corresponding legislation. For example, the 2017 Scoping Plan states that it "establishes a path that will get California to its 2030 target" and "identifies how the State can reach our 2030 climate target to reduce...GHG emissions by 40 percent from 1990 levels." Similarly, CARB's First Update provides that it "lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050." Many of the emissions reduction strategies recommended by CARB would serve to reduce the Project's GHG emissions to the extent required by applicable. An overview of mandatory regulatory measures contained within CARB's Scoping Plans and the effect that they would have on the Project's GHG emissions is included in **Table 5.8-1**, below.

Statewide

Executive Order S-03-05, AB 32, AB 32 Scoping Plan, and First Update

AB 32 adopted and codified Executive Order S-3-05's goal of reducing GHG emissions to 1990 levels by 2020. As noted previously, California achieved this target four years earlier than mandated. The AB 32 Scoping Plan and 2014 First Update outlined and provided the basis for policies that helped California achieve this target by 2020, as well as for policies that will help California continue its GHG emissions reductions beyond 2020. Thus, it follows that if the Project would be consistent with the AB 32 Scoping Plan and the 2014 First Update, then the Project would be consistent with State efforts to continue its achievement of the 2020 target that was established by Executive Order S-3-05 and codified by AB 32.

Table 5.8-1 contains an overview of applicable reduction actions/strategies (categorized by emissions source type) that are outlined in the AB 32 Scoping Plan and its later iterations. The overview provides context surrounding various measures that would indirectly reduce the Project's GHG emissions via their current, future, or continued implementation.

Table 5.8-2 provides a more specific evaluation of the Project's consistency with applicable strategies of the AB 32 Scoping Plan and First Update. Based on this evaluation, the Project would be consistent with all feasible and applicable strategies recommended in the AB 32 Scoping Plan and First Update. Therefore, the Project would be consistent with State efforts to maintain achievement of the 2020 target that was established by Executive Order S-3-05 and codified by AB 32.

Table 5.8-1

Mandatory Regulatory Compliance Measures within the Climate Change Scoping Plan

Mandatory Regulatory Compliance Measures
Energy
RPS Program and SB 2X: The California RPS program (Updated under Senate Bill 2X) required both public and investor-owned utilities in California to receive at least 33 percent of their electricity from renewable sources by the year 2020, 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also required 50 percent renewables by 2030.^A LADWP reports that, as of 2019, it has achieved 34% renewables.^B However, with the recent passage of SB 100, LADWP (along with other electric utilities) is required to increase its renewable energy portfolio to 50 percent by 2026, 60 percent by 2030, and 100 percent by 2045. Additionally, the City's latest Green New Deal sets a target for LADWP to supply 55 percent renewable energy by 2025 and 80 percent by 2036. For 2045, the Green New Deal and SB 100 share the same 100 percent renewables requirement. The Project would comply with these percentage renewables requirements as the Project is served by LADWP, which is tasked with achieving these GHG reduction mandates. The Project's electricity GHG emissions in this analysis do not account for these rapidly changing and escalating renewables requirements. By the Project buildout year of 2025^D, it is reasonable to assume that LADWP may supply at least 55 percent renewable energy, in line with the Green New Deal's 55% target for 2025. As such, GHG emissions from the Project's electricity use would likely be lower than what is identified in this analysis. SB 350: As required under SB 350, a 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, the California Energy Code, and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation.
Cap-and-Trade Program: As required by AB 32 and the AB 32 Scoping Plan, the Cap-and-Trade Program regulates GHG emissions associated with electricity demand, though the program applies to electricity service providers and not directly to development projects. The Project's electricity consumption would benefit from GHG reductions associated with this Statewide program. The Cap-and-Trade program also covers GHG emissions from the combustion of transportation fuels.
Mobile
Advanced Clean Cars Program: CARB's Advanced Clean Cars Program regulates GHG emissions for model years 2017 through 2025 and increases the share of zero emission vehicles manufactured in model years 2018 through 2025. Standards under the Advanced Clean Cars Program apply to all passenger and light duty trucks sold within California. Mobile source GHG emissions in this analysis do not include the additional 34 percent reductions in mobile source emissions attributable to this program as the CalEEMod model does not account for it. The Project would support this regulation as it would include electric vehicle charging facilities. Other mobile source strategies are related to CARB's development of the Innovative Clean Transit and Advanced Clean Trucks programs. The Innovative Clean Transit regulation, adopted in December 2018, requires all public agencies to gradually transition to 100-percent zero-emission bus fleets, in part by mandating that all new bus purchases are zero-emission starting in 2029. Adopted in March 2021, the Advanced Clean Trucks regulation sets increased sales requirements for zero-emission trucks from 2024 to 2035 and contains company and fleet reporting requirements for large employers and fleet owners. The Project would indirectly benefit from both of these measures.

Table 5.8-1

Mandatory Regulatory Compliance Measures within the Climate Change Scoping Plan

Mandatory Regulatory Compliance Measures
Additionally in September 2020, Governor Gavin Newsom issued Executive Order N-79-20, which directs CARB to develop and propose: • Passenger vehicle and truck regulations that would require increasing volumes of new zero-emission vehicles to be sold in the State, including a target of 100 percent of in-state sales by 2035. • Medium- and heavy-duty vehicle regulations that would require increasing volumes of new zero-emission trucks and buses sold and operated in the State. This includes a target that 100 percent of the in-state fleet be zero-emission by 2045, as feasible, and that 100 percent of drayage trucks be zero-emission by 2035. • Strategies to achieve 100 percent zero-emissions from off-road vehicles and equipment operations in the State by 2035. The Project would indirectly benefit from this order over time as these goals are realized. Regulations pursuant to this goal would be issued by CARB as part of its Zero-Emission Vehicle (ZEV) program, which is itself part of the Advanced Clean Cars Program. Low Carbon Fuel Standard (LCFS): The LCFS reduced the carbon intensity of California's transportation fuels by at least 7.5 percent by 2020. The CalEEMod model assumes that the LCFS reduces mobile source emissions accordingly. The 2018 updates to the LCFS target a 20 percent reduction in carbon intensity by 2030. CalEEMod does not take into account these updates to the LCFS. The Project's GHG emissions would benefit from this regulatory program over time.
Solid Waste
California Integrated Waste Management Act of 1989: This regulation required jurisdictions to reduce solid waste by 50 percent by 2000. In 2011, AB 341 amended this regulation to provide a goal of reducing solid waste generation by 75 percent by 2020, and annually thereafter. The Project complies with these diversion requirements as it would be served by the City of Los Angeles, which currently achieves a 76 percent diversion rate. The CalEEMod model conservatively assumes a zero percent diversion rate; as a result, GHG emissions from the Project's solid- waste generation are conservative and would be lower. The Project would contract for waste disposal services from a provider that must meet AB 341 mandates for diversion. Additionally, it is worth noting that the City in its Green New Deal has committed to achieving 100 percent diversion of waste by 2050.
^A SB 350 (2015-2016 Regular Session) Stats 2015, Ch. 547. ^B LADWP. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=waa2z9fpa_4&af))&&_afLoop=292271719357341. Accessed June 27, 2022.

Table 5.8-2

Consistency with the AB 32 Scoping Plan and First Update GHG Emissions Reduction Strategies

Strategy/Recommended Action	Project Consistency
California Cap-and-Trade Program: Implement a broad-based California cap-and-trade program to provide a firm limit on emissions. Link the California cap-and-trade program with other Western Climate Initiative Partner programs to create a regional market system to achieve greater environmental and	Not Applicable. This recommended action called upon the State to develop a cap-and-trade program, which has been implemented. Though the Project would not be relevant to this action, as discussed, the Project would benefit from GHG reductions associated with the State's Cap-and-

Strategy/Recommended Action	Project Consistency
economic benefits for California. Ensure California's program meets all applicable AB 32 requirements for market-based mechanisms.	Trade Program because the program applies to electricity usage and transportation fuels.
California Light-Duty Vehicle Greenhouse Gas Standards: Implement adopted Pavley standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	Not Applicable. This recommended action called upon the State to develop and implement light-duty vehicle standards related to GHG emissions. The development of these standards is not relevant to the Project. However, as discussed, the Project would benefit from previous, existing, and future standards related to this action (i.e., Advanced Clean Cars Program) that are intended to help the State achieve and/or exceed the AB 32 GHG emissions reduction target.
Energy Efficiency: Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly-owned utilities).	Consistent. The Project would be designed to meet the CALGreen building standards that are in effect at the time of its permitting. As discussed previously, the latest standards achieve increased energy and construction efficiencies as compared to previous CALGreen standards. The Project would be in conformance with the current or next-generation CALGreen standards that are intended to help the State achieve and/or exceed the AB 32 GHG emissions reduction target.
Renewables Portfolio Standard: Achieve 33 percent renewable energy mix statewide by 2020.	Consistent. As noted earlier, LADWP reports that it achieved a 34-percent renewables mix by 2019, ahead of the 2020 mandate. As LADWP would provide electricity service to the Project, the Project would use electricity that is consistent with this recommended action. As also noted, LADWP is tasked with achieving the latest SB 100, SB 350, and Green New Deal renewables mandates, which go beyond the 33 percent by 2020 target identified in this recommended action. As a result, the Project would utilize electricity that goes beyond this action's target that was intended to help the State achieve its AB 32 GHG emissions reduction goal for 2020.
Low Carbon Fuel Standard: Develop and adopt the Low Carbon Fuel Standard.	Not Applicable. This recommended action called upon the State to develop and implement the LCFS. The LCFS originally went into effect in April 2010. As discussed earlier, the latest LCFS update targets a 20 percent reduction in carbon intensity by 2030, which goes beyond the reduction that the AB 32 Scoping Plan had targeted for 2020. Thus, Project-related vehicles that use fuels subject to the LCFS would achieve GHG emissions reductions that go beyond the target that was intended to help the State achieve its AB 32 GHG emissions reduction goal for 2020.
Regional Transportation-Related Greenhouse Gas Targets: Develop regional	Not Applicable. This recommended action called upon the State to develop regional greenhouse gas

Strategy/Recommended Action	Project Consistency
greenhouse gas emissions reduction targets for passenger vehicles.	emissions reduction targets for passenger vehicles via SB 375. To be discussed in greater detail below, the Project would be consistent with SCAG's latest 2020-2045 RTP/SCS. Implementation of the 2020-2045 RTP/SCS is projected to reduce per capita transportation emissions 19 percent by 2035 and enable the SCAG regional to fulfil its portion of SB 375 compliance.
Goods Movement: Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	Not Applicable. This recommended action called upon State agencies to implement regulations for promoting efficiency in goods movement.
Million Solar Roofs Program: Install 3,000 MW of solar-electric capacity under California's existing programs.	Not Applicable. This recommended action restated a goal, as part of Governor Arnold Schwarzenegger's Million Solar Roofs Program, to install 3,000 MW of new solar capacity by 2017. The Program reached its one-million solar roofs goal in 2019 and has installed nearly three-times the 3,000 MW target capacity.
Medium/Heavy-Duty Vehicles: Adopt medium and heavy-duty vehicle efficiency measures.	Not Applicable. State agencies are responsible for implementing efficiency measures for vehicles.
Industrial Emissions: Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions and provide other pollution reduction co-benefits. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission. Adopt and implement regulations to control fugitive methane emissions and reduce flaring at refineries.	Not Applicable. The Project does not propose the types of large industrial sources that are covered by this measure (e.g., power plants, refineries, cement plants, etc.).
High Speed Rail: Support implementation of a high-speed rail system.	Not Applicable. This recommended action called upon the California High Speed Rail Authority and stakeholders to develop a statewide rail transportation system.
Green Building Strategy: Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	Consistent. As discussed above, the Project would be designed to meet the CALGreen building standards that are in effect at the time of its permitting. The latest standards achieve increased energy and construction efficiencies as compared to previous CALGreen standards. The Project would be in conformance with the current or next-generation CALGreen standards that are intended to help the State achieve and/or exceed the AB 32 GHG emissions reduction target.
High Global Warming Potential Gases: Adopt measures to reduce high global warming potential gases.	Not Applicable. State agencies are responsible for implementing these measures.
Recycling and Waste: Reduce methane emissions and landfills. Increase waste	Consistent. This recommended action does not include specific or quantifiable goals for the

Strategy/Recommended Action	Project Consistency
diversion, composting and other beneficial uses of organic materials and mandate commercial recycling. Move toward zero waste.	recycling and waste sector. In the Green New Deal, the City has committed to achieving a 100 percent diversion rate of waste by 2050. The Project would contract with a waste disposal services provider that meets AB 341 and City requirements for waste diversion.
Sustainable Forests: Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	Not Applicable. Resource agency departments are responsible for implementing this measure.
Water: Continue efficiency programs and use cleaner energy sources to move and treat water.	Consistent. This recommended action does not include specific or quantifiable goals for the water sector. However, the Project would be designed to meet the CALGreen building standards and other water efficiency measures that are in effect at the time of its permitting. As noted, California achieved its 2020 AB 32 GHG emissions reduction target four years ahead of schedule. It reasons that the CALGreen building standards and other applicable water efficiency measures would be capable of achieving or exceeding water-sector-related reductions outlined in the First Update.
Agriculture: In the near-term, encourage investment in manure digesters and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	Not Applicable. This recommended action concerned methane capture at large dairy facilities.
Source: CAJA, 2022.	

Executive Order B-30-14, SB 32, and 2017 Scoping Plan

SB 32 adopted and codified Executive Order B-30-15's goal of reducing GHG emissions to 40 percent below 1990 levels by 2030. The 2017 Scoping Plan addresses how this target may be achieved. Specifically, it states that the Plan "establishes a path that will get California to its 2030 target" and "identifies how the State can reach our 2030 climate target to reduce...GHG emissions by 40 percent from 1990 levels." The 2017 Scoping Plan also acknowledges how many emission reduction strategies would establish "a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050." The 2017 Scoping Plan and the SB 32 objectives that drive it involve 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. Although a number of these strategies are currently promulgated, some 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. The 2017 Scoping Plan outlines and provides the basis for policies that are anticipated to help California achieve its targeted GHG emissions reductions for 2030 and beyond. Thus, it follows that if the Project would be consistent with the 2017 Scoping Plan, then the Project would be consistent with State efforts to achieve the 2030 GHG emissions target that was established by Executive Order B-30-15 and codified by AB

32. It also follows that the Project would be consistent with efforts to progress “on the path” to the 2050 target, as well.

Table 5.8-3 provides a specific evaluation of the Project’s consistency with applicable strategies of the 2017 Scoping Plan. Based on this evaluation, the Project would be consistent with all feasible and applicable strategies recommended in the 2017 Scoping Plan. Therefore, the Project would be consistent with State efforts to achieve the 2030 GHG emissions reduction target that was established by Executive Order S-3-05 and codified by AB 32. The Project would also be consistent with efforts to progress “on the path” to the 2050 target, as well.

Table 5.8-3
Consistency Analysis – 2017 Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Senate Bill 350 (SB 350): - Requires 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. - 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.	CPUC, CEC, CARB	No Conflict. As LADWP would provide electricity service to the Project Site, and as LADWP is tasked with achieving the latest SB 100 and Green New Deal renewables mandates that exceed the prior SB 350 mandates, the Project would use electricity that goes beyond the renewables requirements of SB 350. The Project would also comply with the latest CalGreen and Title 24 energy efficiency standards that are in effect at the time of its permitting.
Senate Bill 100 (SB 100): The California Renewables Portfolio Standard Program (2018) requires a Statewide renewables energy portfolio that requires retail sellers to procure renewable energy that is at least 50 percent by December 31, 2026, and 60 percent by December 31, 2030. It would also require that local publicly owned electric utilities procure a minimum quantity of electricity from renewable energy resources and achieve 44 percent of retail sales by December 31, 2024, and 60 percent by December 31, 2030.	LADWP, CPUC	No Conflict. As discussed, LADWP is required to generate electricity that would achieve these renewables mandates. As LADWP would provide electricity service to the Project, the Project would use electricity that is consistent with the requirements of SB 100.
Implement Mobile Source Strategy (Cleaner Technology and Fuels) At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025.	CARB, CalSTA, SGC, CalTrans CEC, OPR, Local agencies	No Conflict. GHG emissions generated by Project-related vehicular travel would benefit from the proposed regulations, and mobile source emissions generated by the Project would be reduced with the

Table 5.8-3
Consistency Analysis – 2017 Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
• 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 • Last Mile Delivery • 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.”		implementation of standards under the Advanced Clean Cars Program, consistent with the reduction of GHG emissions under AB 32. However, mobile source GHG emissions estimates do not include the additional 34-percent reduction in mobile source emissions attributable to this program. The Project would support this regulation as it would include electric vehicle charging facilities. The Project would indirectly benefit from CARB’s Innovative Clean Transit and Advanced Clean Trucks programs, which were adopted in December 2018 and March 2021, respectively. With regard to SB 375, the Project’s consistency with SCAG’s latest 2020-2045 RTP/SCS is discussed later. Implementation of the 2020-2045 RTP/SCS, which the Project would aid in, is projected to reduce per capita transportation emissions 19 percent by 2035 (as compared to 2005 levels), thus enabling the SCAG region to fulfil its portion of SB 375 compliance.
Increase Stringency of SB 375 Sustainable Communities Strategy (2035 Targets)	CARB	No Conflict. The Project’s consistency with SCAG’s latest 2020-2045 RTP/SCS is discussed later in this report. Implementation of the 2020-2045 RTP/SCS, which the Project would aid in, is projected to reduce per capita transportation emissions 19 percent by 2035 (as compared to 2005 levels), thus enabling the SCAG region to fulfil its portion of SB 375 compliance.
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	CalSTA and SGC, OPR, CARB, GoBiz, IBank, DOF, CTC, Caltrans	Not Applicable. The Project would not involve the construction of any transportation facilities. However, the Project’s proximity to high quality bus stops and a future D Line station would promote the use of transit options by Project residents and users. Further,

**Table 5.8-3
Consistency Analysis – 2017 Scoping Plan**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
guideline documents, funding programs, project selection).		the Project would be located in a “Pedestrian Enhanced District” (per the City’s Mobility Plan 2035), which means that the Project would be located in an area that the City has identified and targeted for prioritized pedestrian improvements and funding. The Project’s addition of dense multi-family housing to this area would help leverage any future transit and pedestrian-related investments and improvements to the area.
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 Project would support this policy as it would include EV parking spaces.
Implement California Sustainable Freight Action Plan: • Improve freight system efficiency. • Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.	CalSTA, CalEPA, CNRA, CARB, CalTrans, CEC, GoBiz	Not Applicable. This action/strategy calls upon State agencies and regulators to implement recommendations of the California Sustainable Freight Action Plan. The Project would not include freight transportation or warehousing uses.
Adopt a Low Carbon Fuel Standard with a CI reduction of 18 percent.	CARB	No Conflict. On September 27, 2018, CARB amended the LCFS regulation to target a 20 percent reduction in CI from a 2010 baseline by 2030. This regulatory program applies to fuel suppliers, not directly to land use development. GHG emissions related to vehicular travel associated with the Project would benefit from this regulation because fuel used by Project-related vehicles would be required to comply with the LCFS. CalEEMod, which was used to estimate the Project’s GHG emissions, accounts for the LCFS when calculating mobile source GHG emissions.
Implement the Short-Lived Climate Pollutant Strategy by 2030:	CARB, CalRecycle, CDFA, SWRCB, Local air districts	No Conflict. The Project would comply with the CARB Short-Lived Climate Pollutant (SLCP) Reduction

Table 5.8-3
Consistency Analysis – 2017 Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
• 40 percent reduction in methane and hydrofluorocarbon emissions below 2013 levels. • 50 percent reduction in black carbon emissions below 2013 levels.		Strategy, which limits the use of hydrofluorocarbons for refrigeration uses.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	CARB, CalRecycle, CDFA, SWRCB, Local air districts	Not Applicable. This strategy calls on regulators to reduce GHG emissions from landfills and is not applicable to the Project. Under SB 1383, the California Department of Resources Recycling and Recovery (CalRecycle) is responsible for achieving a 75-percent reduction in the level of statewide disposal of organic waste (from 2014 levels) by 2025.
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 the Project. 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. • Establish scenario projections to serve as the foundation for the Implementation Plan.	CNRA and departments within, CDFA, CalEPA, CARB	Not Applicable. This applies to State regulators and is not applicable to the Project. This regulatory program applies to Natural and Working Lands, and it is not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan.

**Table 5.8-3
Consistency Analysis – 2017 Scoping Plan**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
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 the Project. This regulatory program applies to Natural and Working Lands, and it is not directly related to development of the Project. However, the 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 the Project. This regulatory program applies to state and federal forest land, and it is not directly related to development of the Project. However, the 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 and Local Agencies	Not Applicable. This applies to State regulators and is not applicable to the Project. Funding and financing mechanisms are the responsibility of the state and local agencies. The Project would not conflict with funding and financing mechanisms to support GHG reductions.
<i>Source: CARB, California's 2017 Climate Change Scoping Plan, November 2017.</i>		

Regional

2020-2045 RTP/SCS

As noted earlier, SCAG's latest 2020-2045 RTP/SCS (is expected to help the SCAG region, and in turn California, reach its latest GHG reduction goals. Implementation of the 2020-2045 RTP/SCS is projected to reduce per capita vehicle GHG emissions by 19 percent by 2035, thus enabling the region to fulfill its portion of SB 375 compliance. Implementation is also projected to reduce daily VMT per capita by 5 percent by 2045.

Generally, projects are considered consistent with the provisions and policies of applicable City and regional land use plans and regulations if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The land use pattern emphasized by the 2020-2045 RTP/SCS involves concentrating new, dense housing and/or job growth in infill locations and HQTAs in an effort to facilitate alternative transportation modes and reduce vehicle trips and VMT. Development of the Project would be consistent with this land use

pattern and related smart growth policies to increase housing density within HQTAs and along Livable Corridors. Not only would the Project be located within an HQTA and along a Livable Corridor, but the Project also qualifies based on its proximity to high quality bus stops.

By developing dense residential housing in an existing low-intensity infill location that is also within an HQTA a Livable Corridor, the Project would contribute directly to the goals of SCAG's 2020-2045 RTP/SCS. Given these considerations, the Project is appropriately located and supports the 2020-2045 RTP/SCS and its smart growth strategies to efficiently coordinate land usage and transportation in an effort to reduce VMT and related GHG emissions.

The Project would result in a household VMT per capita that is below the Area Planning Commission's average. This would substantially exceed the 2020-2045 RTP/SCS's objective of reducing daily VMT per capita by 5 percent by 2045 across the SCAG region.

Table 5.8-4 includes further discussion regarding the Project's consistency with the applicable GHG-related performance measures and objectives of the 2020-2045 RTP/SCS.

Table 5.8-4
Consistency with the 2020-2045 RTP/SCS

Objectives	Consistency Analysis^a
Increase percentage of region's total household growth occurring within HQTAs.	Not Applicable. The Project would add 290 dwelling units to the region's housing stock, all of which would be located within a HQTA.
Increase percentage of the region's total employment growth occurring within HQTAs.	No Conflict. The Project would include commercial space, and it would also create jobs related to the leasing and maintenance of its residential uses. The Project would not inhibit job growth within this or other HQTAs.
Decrease total acreage of greenfield or otherwise rural land uses converted to urban use.	No Conflict. The Project is an urban infill development that would reduce the demand for sprawl development in greenfield or rural areas on the fringes of Southern California.
Decrease daily vehicle miles driven per person.	No Conflict. As discussed, the Project is projected to result in a household VMT per capita that is below the Area Planning Commission's average. This is mainly due to the Project's abundant high quality transit options. Other VMT reducing TDM strategies will be employed such as provision of bicycle parking spaces and unbundling the residential parking spaces from the units.
Decrease average daily distance traveled for work and non-work trips (in miles)	No Conflict. Same as above.
Increase percentage of work and non-work trips which are less than 3 miles in length.	No Conflict. The Project is an urban infill development, and its proximity to communities with a high density of housing, jobs, and other destinations, all in a transit-rich environment near Job Centers, would increase the percentage of trips that are less than three miles in length.
Increase share of short trip lengths for commute purposes.	No Conflict. Same as above.
Decrease average minutes of delay experienced per capita due to traffic congestion.	No Conflict. The nature of the Project as an urban infill development; its proximity to communities with a high density of housing, jobs, and other destinations; and its

Table 5.8-4
Consistency with the 2020-2045 RTP/SCS

Objectives	Consistency Analysis ^a
	location in an HQTa near multiple Job Centers would help reduce the rate of traffic and congestion growth.
Decrease excess travel time resulting from the difference between a reference speed and actual speed.	No Conflict. For similar reasons as above, the Project would help reduce traffic congestion-related delays for general vehicles.
Increase percentage of PM peak period trips completed within 45 minutes by travel mode.	No Conflict. As stated above, the Project would help reduce traffic congestion-related delays for general vehicles. Additionally, because of the Project's proximity to communities with a high density of housing, jobs, and other destinations, including Job Centers, the share of PM peak period trips that are less than 45 minutes would increase as compared to a scenario in which the Project is developed in an urban sprawl location, or an alternate infill location farther from employment centers and less well served by transit infrastructure (i.e., non HQTa or TPA).
Increase percentage of trips that use transit (work and all trips)	No Conflict. The Project's location in an HQTa, TPA would encourage transit use by future residents and other project users and help increase transit mode share.
Decrease average travel time to work (all modes)	No Conflict. For the reasons discussed above, the Project would be consistent with this objective.
Increase percentage of trips using either walking or biking (by trip type)	No Conflict. The Project's addition of dense multi-family housing to this district would help increase pedestrian mode share. The Project would also provide bicycle parking spaces for residents and commercial users, which would encourage bicycle use.
Reduce per capita GHG emissions (from 2005 levels)	No Conflict. As discussed throughout this analysis, the Project would be consistent with AB 32, SB 32, SB 375, and other initiatives designed to reduce per capita GHG emissions from 2005 levels.
Increase percentage of trips using a travel mode other than single occupancy vehicle (SOV)	No Conflict. For the reasons discussed above, the Project would be consistent with this objective.
<i>Source: Southern California Association of Governments; 2020–2045 RTP/SCS; September 2020.</i>	

Local

City of Los Angeles Mobility Plan 2035

While the Mobility 2035 Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation, and targeting GHG reductions via a more sustainable transportation system. The Project is consistent with these general objectives for many, if not all, of the same reasons that it is consistent with SCAG's RTP/SCS, which prioritizes similar strategies to reduce GHG emissions from transportation. As discussed above, the Project would support smart growth strategies to efficiently coordinate land usage and transportation to reduce transportation-related GHG emissions.

Sustainable City pLAn/Green New Deal

The Sustainable City pLAn, a mayoral initiative, 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. Though the Sustainable City pLAn and its update, the City's Green New Deal, are not plans that have been adopted solely to reduce GHG emissions, the Green New Deal includes climate mitigation as one of eight explicit benefits that help define its strategies and goals.

Generally, these plans provide information as to how the City will manage buildings and infrastructure in its control. They also provide specific targets related to housing and development, as well as mobility and transit. For example, targets include reducing VMT per capita by 5 percent by 2025 and increasing trips made by walking, biking, or transit by at least 35 percent by 2025. The latest Green New Deal document establishes targets such as achieving 100 percent renewable energy by 2045, diverting 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035. Although the Sustainable City pLAn and Green New Deal are not adopted plans that are directly applicable to private development projects, the Project would benefit from the City's commitment to the goal and aspirations outlined in these documents. An overview of how the Project relates to actions and measures contained in the Green New Deal is contained in **Table 5.8-5**, below.

Table 5.8-5
Consistency with Applicable GHG Emissions Goals and Actions of LA's Green New Deal

Action	Description	Consistency Analysis
Focus Area: Renewable Energy		
Increase cumulative MW by 2025; 2035; and 2050 of: - Local solar to 900-1,500 MW; 1,500-1,800 MW; and 1,950 MW. - Energy storage capacity to 1,654-1,750 MW; 3,000 MW; and 4,000 MW. - Demand response (DR) programs to 234 MW (2025) and 600 MW (2035).	The City would provide community solar programs for low income and renter households. The City would launch a "Virtual Net Energy Metering" program. The City would streamline permitting processes for energy storage projects and would pilot technology for dispatchable and customer-side storage. The City would investigate bidirectional smart-grid technologies to prepare for large-scale adoption of EVs. The City would implement a communication network to enable use of smart meters.	No Conflict. These actions apply to the City. The Project would be built according to CALGreen and CEC requirements regarding photovoltaic systems and solar readiness. The Project would also include EV parking spaces, which would help leverage the City's commitment to EV-related smart-grid technology improvements.
Focus Area: Local Water		
Reduce potable water use per capita by 22.5% by 2025; and 25% by 2035; and maintain or reduce 2035 per capita water use through 2050.	The City would build upon the success of the Save the Drop program and develop additional water conservation campaigns. In addition, the City would continue to benchmark customer use and improve data gathering to identify effective programs.	No Conflict. While this action primarily applies to the City and LADWP, the Project would incorporate water conservation features to reduce water use. The Project would be built consistent with relevant California Plumbing Code, CALGreen, Los Angeles Plumbing

		Code, and Los Angeles Green Building Code standards that apply at the time of the Project's permitting.
Focus Area: Clean and Healthy Buildings		
All new buildings will be net zero carbon by 2030; and 100% of buildings will be net zero carbon by 2050.	The City would perform a complete building electrification study and develop supporting programs. Financing and incentives would be expanded in existing energy efficiency and solar incentive programs.	No Conflict. While this action primarily applies to the City, the Project would be designed and operated to meet the applicable requirements of CALGreen and the Los Angeles Green Building Code. The Project would be subject to the latest Title 24 Standards or future standards, which are a major step towards achieving future zero net energy goals.
Reduce building energy use per square foot for all building types 22% by 2025; 34% by 2035; and 44% by 2050.	The City would increase awareness of incentives and smart building energy management systems. An energy consumption report will be prepared to assess the energy-water nexus	No Conflict. While this action primarily applies to the City, the Project would be designed and operated to meet or exceed the applicable requirements of CALGreen and the Los Angeles Building Code.
Focus Area: Mobility and Public Transit		
Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35% by 2025; 50% by 2035; and maintain at least 50% by 2050.	The City would launch a regionally coordinated working group of mobility partners to encourage shared, sustainable mobility options. The City would support the implementation of a congestion pricing pilot. The City would identify opportunities to improve pedestrian comfort and update City standard plans for public works projects to integrate pedestrian-centric design into applicable projects. The City would implement Vision Zero safety improvements. The City would improve travel time on the County bus network by 30 percent by expanding DASH service and executing a suite of bus and transit corridor facility improvements. The City would continue to build out its subway and light rail network. The City would expand the bike lane network by 20 lane-miles per year and increase bicycle-supportive infrastructure like public bicycle parking. The City would expand electric car sharing options.	No Conflict. This action primarily applies to the City. However, the Project would be supportive of this action. The Project would be located in a HQT, TPA, and a Pedestrian Enhanced District. The Project would also provide bicycle parking spaces for residential and commercial users. As discussed, these and other factors would increase transit and active mode share.
Reduce Vehicle Miles Travelled (VMT) per capita by at least	The City would update the Transportation Demand Management (TDM) ordinance and	No Conflict. Same as above.

13% by 2025; 39% by 2035; and 45% by 2050.	develop first/last mile infrastructure improvements around transit stations. TDM strategies would also be implemented consistent with the West Side Mobility Plan to ease congestion. The City would launch a user-friendly searchable app mapping all curbside designations throughout the City. It would also expand the Metro Bike Share program to at least three new neighborhoods.	
<i>Source: Sustainable City pLAn 2019 ("L.A.'s Green New Deal").</i>		

Plan Consistency Conclusion

In summary, the consistency analysis provided above demonstrates that the Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. As a result, the Project's GHG emissions would not result in a significant impact to the environment, and Project-specific impacts with regard to climate change would be less than significant.

Existing Project Site Emissions

The Project site is currently improved with an existing 14-story mixed-use building (Existing Building) consisting of 194 dwelling units and 9,533 square feet of commercial uses, as well as surface parking lot areas that would be demolished for the construction of the proposed uses. Emissions associated with the Existing Building (exclusive of existing parking lot area) were estimated for informational purposes, and it was determined that the Existing Building may generate about 3,275 MT of CO₂e annually.

Methodology

Section 15064.4 of the CEQA Guidelines recommends that lead agencies quantify GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project: the extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs.

However, Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence. The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analysis. It is noted that the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact less than significant.

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

In the absence of any applicable adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the Project is consistent with applicable regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2020-2045 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers consistency with regulations or requirements adopted by the AB 32 2008 Scoping Plan and its subsequent updates, as well as the City's Sustainable pLAN/Green New Deal.

Construction

The Project's construction emissions were calculated using CalEEMod Version 2016.3.2. Details of the modeling assumptions and emissions factors are provided in **Appendix B**. GHG emissions from construction activities were modeled using a reasonable estimate of the Project's construction schedule and phasing. CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips.

In accordance with SCAQMD guidance, GHG emissions from construction were amortized over the lifetime of the Project. Because emissions from construction activities occur over a relatively short-term period of time, they contribute a relatively small portion of the overall lifetime GHG emissions for a project. Additionally, GHG emissions reduction measures for construction equipment are relatively limited. Thus, SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime so that GHG emissions reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.⁹⁶ As a result, the Project's total construction GHG emissions were divided by 30 to determine an approximate annual construction emissions estimate comparable to operational emissions.

Operations

Similar to construction, the SCAQMD-recommended CalEEMod is used to calculate potential GHG emissions generated by new land uses on the Project site. The Project would result in direct

⁹⁶ SCAQMD Governing Board Agenda Item 31. December 5, 2008.

and indirect GHG emissions generated by related vehicle trips and operations associated with the proposed building.

Project Emissions

As discussed above, compliance with applicable GHG emissions reductions plans renders a Project less than significant. In support of the consistency analysis provided above, the following quantitative calculations of the Project's GHG emissions are provided. The Project would result in direct and indirect GHG emissions generated by the following emissions sources:

Construction: emissions associated with construction-related equipment and vehicle use.

Area Sources: emissions associated with the on-site use of powered equipment.

Energy Sources: emissions associated with the Project's electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting.

Mobile Sources: emissions associated with the Project's related vehicle travel.

Water/Wastewater: emissions associated with energy used to pump, convey, deliver, and treat water.

Construction

Project construction is anticipated to last approximately 27 months. A summary of construction details (e.g. schedule, equipment mix, and vehicular trips) and CalEEMod modeling output files are provided in **Appendix B**. The GHG emissions associated with the construction of the Project were calculated by year and as a sum of all construction phases, as development of the Project would be phased. A summary of GHG emissions for each year of construction is presented in **Table 5.8-6**.

As shown in **Table 5.8-6**, construction of the Project is estimated to generate a total of 976 MTCO₂e. As recommended by the SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e. total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's annual operational emissions) in order to determine the Project's annual GHG emissions inventory.⁹⁷ This results in annual Project construction emissions of approximately 33 MTCO₂e.

Table 5.8-6
Construction-Related Emissions

Year	Emissions (MTCO ₂ e)
2021 – Parking Building construction only	208
2022 – Parking Building and Proposed Building construction emissions	436
2023 – Proposed Building construction only	332
Total	976
Amortized over 30 years	33
Source: NTEC, 2020.	

⁹⁷ SCAQMD Governing Board Agenda Item 31. December 5, 2008.

Operations

As shown in **Table 5.8-7**, the Project is estimated to generate approximately 2,751 MTCO₂e per year, including the addition of its annualized construction-related GHG emissions.

Table 5.8-7
Annual GHG Emissions Summary

Source	Emissions (MTCO ₂ e)
Area	3
Energy	925
Mobile	1,504
Solid Waste	71
Water/Wastewater	215
Construction	33
Total Emissions	2,751
Source: NTEC, 2020.	

Cumulative Impacts

Less Than Significant Impact.

As explained earlier, the analysis of a project's GHG emissions is inherently a cumulative impact analysis because climate change is a global problem and the emissions from any single project alone would be negligible. Accordingly, the analysis above took into account the potential for the Project to contribute to the cumulative impact of global climate change. Given the Project's consistency with statewide, regional, and local plans adopted for the reduction of GHG emissions, it is concluded that the Project's incremental contribution to greenhouse gas emissions and its effect on global climate change would not be cumulatively considerable. For these reasons, the Project's cumulative contribution to global climate change would be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions?	☐	☐	☒	☐
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?	☐	☐	☐	☒
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

This section is based on the following item, included as **Appendix G** of this SCEA:

G Phase I Environmental Site Assessment Report, EFI Global, June 16, 2020.

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

Less Than Significant Impact.

Construction of the Project would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials include paints, adhesives, surface coatings, cleaning agents, fuels, and oils that are typically associated with development of any urban mixed-use project. All of these materials would be used temporarily during construction. Thus, construction of the Project does not involve the routine transport, use, or disposal of hazardous materials.

Additionally, all potentially hazardous materials associated with construction activities would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which further minimizes the potential risk associated with construction-related hazardous materials. Finally, the construction activities are contained on the Project Site and, thus, any emissions from the use of such materials would be minimal and localized to the Project Site. Therefore, construction of the Project would not expose persons or

the environment to a substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards.

Similarly, from an operational perspective, the Project does not involve the routine use, transport, or disposal of hazardous materials. The Project includes the development of residential, commercial, and parking uses. These typical urban uses do not involve the routine use of hazardous materials. Instead, the operation of the Project has limited hazardous materials similar to any other mixed-use urban development. For example, the proposed uses would involve the use and storage of small quantities of potentially hazardous materials such as cleaning solvents, paints, and pesticides for landscaping. Likewise, the Project's commercial and office uses could include commercial-grade cleaning solvents, waxes, dyes, toners, paints, bleach, grease, and petroleum products that are typically associated with commercial land uses. In other words, the Project generally would not produce significant amounts of hazardous waste, use or transport hazardous waste beyond those materials typically used in an urban development. Thus, none of the Project's operational features, or the type of hazardous materials used on the Project Site, creates a significant hazard to the environment or public.

Moreover, the Project would adhere to regulatory requirements for source hazardous waste reduction measures (e.g., recycling of used batteries, recycling of elemental mercury, etc.) that would further minimize the generation of hazardous waste. In addition, the Project will comply with the applicable City ordinances regarding implementation of hazardous waste reduction efforts on-site (i.e., the City's Green Building Ordinance). The applicable regulatory requirements further ensure that the minimal amount of hazardous materials associated with the Project are properly treated and disposed of at licensed resource recovery facilities or hazardous waste landfills.

The potential transport of any hazardous materials and wastes, i.e., paints, adhesives, surface coatings, cleaning agents, fuels, and oils, if it occurs, would occur in accordance with federal and state regulations that govern the handling and transport of such materials. In accordance with such regulations, the transport of hazardous materials and wastes would only occur with transporters who have received training and appropriate licensing. Therefore, impacts would be less than significant.

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

Less Than Significant Impact.

Historical Use

According to EFI Global's interpretation of the historical research data, the Site was developed with approximately two residential structures on the property and agricultural land with several associated small agricultural structures from sometime prior to 1928 to at least 1952. During this period, one of the residential structures was converted to commercial use as a liquorstore (Spirit Boys Liquor). The residential and agricultural structures were demolished in 1961. The existing thirteen-story structure with basement was erected in 1962 in the northeast corner of the subject property and the remainder of the property was redeveloped as a parking lot at this time. The structure was originally developed for use as offices. Historical occupants included various

professional offices from 1962 to 1994. In 1994, the office building sustained structural damage in the Northridge Earthquake and remained vacant from 1994 to 2015. SkyTel telecommunications company operated a cellular tower on the roof of the Site from sometime between 1994 and prior to 2015. From sometime prior to 2005 to the present, MPVS has operated a prop car storage yard on the western side of the subject property. In 2012, a small canopy was erected in the southwestern corner of the Site. The Site use was repurposed into commercial/residential (live-work suites) by 2016, with additional structural remodels and renovations noted through at least 2018. The Site has remained in this configuration to the present.

Environmental Data Search

The Site was identified as a California Hazardous Waste Tracking System (HWTS) site. This HWTS identified the subject property with the Environmental Protection Agency (EPA) Identification Number (ID) CAC002911537. According to the DTSC HWTS this is an inactive ID which previously pertained to Grand Pacific 7-28 for the year 2017. No hazardous waste manifest were reported. Based on the lack of reported waste manifest as well as the inactive status, this listing is not expected to represent a significant environmental concern.

None of the other sites listed on the regulatory database report pose a significant threat to the subject property as there is no indication of a release at the respective sites, a release has occurred but groundwater has not been impacted, a release has occurred but the case is closed, or the sites are located cross or down gradient of the subject property and in excess of 1/10 mile from the Site.

The Los Angeles Regional Water Quality Control Board (LARWQCB), Department of Toxic Substances Control (DTSC), South Coast Air Quality Management District (SCAQMD), Los Angeles County Fire Department Health Hazmat Division (LACFD HHMD), and the City of Los Angeles Bureau of Sanitation (LABS) were contacted regarding permits, site investigation files, air emissions, hazardous materials, underground storage tank, and industrial waste discharge records for the Site. Additionally, the State Water Resources Control Board (SWRCB) online GeoTracker and Storm Water Multiple Application and Report Tracking System (SMARTS), DTSC online EnviroStor and Hazardous Waste Tracking System (HWTS), SCAQMD online Facility Information Detail (FIND), the City of Los Angeles Fire Department (LAFD) Certified Unified Program Agency (CUPA) online Active and Inactive CUPA Regulated Facilities and Underground Storage Tank Inventory online databases which include active and inactive Aboveground Storage Tanks (AST), Inactive and Active Underground Storage Tanks, Inactive and Active Hazardous Materials Inventory, Underground Storage Tank Historical Files databases and the LACFD HHMD Active CUPA Program Records, Inactive CUPA Program Records, Site Mitigation Unit (SMU) Case Records, and California Accidental Release Program (CalARP) online databases were searched for information on the Site to identify any evidence of previous or current hazardous material usage.

There are no files for the Site with the LARWQCB, DTSC, LACFD HHMD, LABS, LAFD, or on the SWRCB GeoTracker, SMARTS, and EnviroStor online databases.

The SCAQMD identified the site as Facility IDs 81280 (Panorama Enterprises/8151-8155 Van Nuys Boulevard), 69815 (LACo San Fernando Valley Children's Service/8155 Van Nuys Boulevard), and 191095 (Panorama Tower/8155 Van Nuys Boulevard). Facility ID 81280 was

issued a Permit to Operate (PTO) in 1992 for a natural gas boiler. Facility ID 191095 was issued two PTOs in 2019 for two boilers. No PTOs were reported for Facility ID 69815. No Notices of Violations (NOVs) or Notices to Comply (NTC) were reported for any of the aforementioned Facility IDs. Based on the nature of these PTOs and the lack of reported violations, these listings are not expected to represent a significant environmental concern.

No significant data gaps were encountered during our agency file reviews.

The City of Los Angeles NavigateLA Online Mapping System was reviewed to obtain substructure maps for the subject property. According to a review of the substructure maps for the subject property, no USTs or other substructure features were identified in the area of the subject property.

The User did not provide EFI Global any information either verbally or in writing (i.e. Title Report) regarding environmental cleanup liens or activity and use limitations encumbering the subject property. An environmental lien search was not requested by the User; however, based on our review of the DTSC EnviroStor Database, no environmental liens enforced by the DTSC were identified.

The Phase I has revealed no evidence of recognized environmental conditions (RECs), historic RECs, or Controlled RECs in connection with the Site. Based on this, no additional investigation is recommended at this time.

Oil and Gas Wells

The California Department of Conservation, Geologic Energy Management Division (CalGEM) online mapping application Well Finder, formerly known as the California Division of Oil, Gas, and Geothermal Resources (DOGGR) Online Mapping System was reviewed for information pertaining to oil and gas exploration on or nearby the subject property. No oil wells were identified within 500 feet of the Site.⁹⁸

Methane

The Project Site is not within a Methane Buffer Zone.⁹⁹

Operational Health Hazards

The Project shall be maintained in a neat, attractive, and safe condition at all times. On-site activities shall be conducted so as not to create noise, dust, odor, or other nuisances to surrounding properties. Trash and recycling bins shall be maintained with a lid in working condition; such lid shall be kept closed at all times. Trash and garbage collection bins shall be maintained in good condition and repair such that there are no holes or points of entry through which a rodent could enter. Trash and garbage collection containers shall be emptied a minimum of once per week. Trash and garbage bin collection areas shall be maintained free from trash, litter, garbage, and debris.

98 California Department of Conservation, Division of Oil, Gas & Geothermal Resources (DOGGR), Online Mapping System, District 1, <https://maps.conservation.ca.gov/doggr/wellfinder/#close/>, accessed August 23, 2022.

99 ZIMAS search: <http://zimas.lacity.org/>, accessed August 23, 2022.

Therefore, impacts would be less than significant.

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

Less Than Significant Impact.

A project-related significant adverse effect may occur if the Project Site is located within 0.25-mile (1,320 feet) of an existing or proposed school site, and is projected to release toxic emissions, which would pose a health hazard beyond regulatory thresholds.

The Project is located within 0.25 mile of the following schools:

- Panorama High School, located at 8015 Van Nuys, 390 feet south of the Site.
- Burke High School and East Valley New Continuation School, co-located at 14630 Lanark Street, 600 feet southwest of the Site.
- Michelle Obama Elementary School, located at 8150 Cedros Avenue, 420 feet west of the Site.

The Phase I has revealed no evidence of recognized environmental conditions in connection with the Site.

Compliance with existing applicable laws cited above would ensure that impacts during construction and operation would be less than significant.

- d) **Would the project 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, caused in whole or in part from the project's exacerbation of existing environmental conditions?**

Less Than Significant Impact.

California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. This question would apply only if the Project Site is included on any of the above referenced lists (see question b), above) and would therefore pose an environmental hazard to the public or the environment. In meeting the provisions in Government Code Section 65962.5, commonly referred to as the "Cortese List," database resources that provide information regarding identified facilities or sites include EnviroStor, GeoTracker, and other lists compiled by the California Environmental Protection Agency:

According to EnviroStor, there are no cleanup sites (either Federal Superfund, State Response, voluntary, school evaluation, school investigation, military evaluation, tiered permit, or corrective action), permitted sites (either operating, post-closure, or non-operating), LUFT (leaking

underground fuel tanks) or SLICS (Spills, Leaks, Investigation, and Cleanup) on, in or under the Project Site.¹⁰⁰

According to GeoTracker, there are no LUST sites, other cleanup sites, land disposal sites, military sites, waste discharge requirement (WDR) sites, permitted UST facilities, monitoring wells, or California Department of Toxic Substance Control cleanup sites or hazardous materials permits on, in or under the Project Site.¹⁰¹

The Project Site has not been identified as a solid waste disposal site having hazardous waste levels outside of the Waste Management Unit.¹⁰²

There are no active Cease and Desist Orders or Cleanup and Abatement Orders from the California Water Resources Control Board associated with the Project Site.¹⁰³

The Project Site is not subject to corrective action pursuant to the Health and Safety Code, as it has not been identified as a hazardous waste facility.¹⁰⁴

The Project Site is not a City-designated Hazardous Waste / Border Zone Property.¹⁰⁵

Compliance with existing applicable laws cited above would ensure that impacts during construction and operation would be less than significant.

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

No Impact.

The Project is not within an airport hazard area.¹⁰⁶ The Project Site is not located within two miles of a public airport:

- Van Nuys Airport is 2.15 miles to the west.
- Whiteman Airport is 3.30 miles to the northeast.
- Hollywood Burbank Airport (Bob Hope Airport) is 4.75 miles to the southeast.
- Santa Monica Municipal Airport is located 13.75 miles to the south.

100 CA Department of Toxic Substance Control, EnviroStor, website: <http://www.envirostor.dtsc.ca.gov/public/>, August 23, 2022.

101 CA State Water Resources Control Board, GeoTracker, website: <http://geotracker.waterboards.ca.gov/map>, August 23, 2022.

102 CA Environmental Protection Agency, Cortese List Data Resources, Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit, website: <http://www.calepa.ca.gov/SiteCleanup/CorteseList/CurrentList.pdf>, accessed August 23, 2022.

103 CA Environmental Protection Agency, Cortese List Data Resources, List of "Active" CDO and CAO from Water Board, website: <http://www.calepa.ca.gov/sitecleanup/corteselist/>, accessed August 23, 2022.

104 CA Environmental Protection Agency, Cortese List Data Resources, Cortese List: Section 65962.5(a), website: <http://www.calepa.ca.gov/SiteCleanup/CorteseList/SectionA.htm#Facilities>, accessed August 23, 2022.

105 ZIMAS search: <http://zimas.lacity.org/>.

106 ZIMAS search: <http://zimas.lacity.org/>.

- Los Angeles International Airport (LAX) is approximately 18.5 miles to the south.

There are no nearby private airstrips. The Goodyear Blimp Airbase in Carson is located approximately 28 miles to the south.

Given the distance between the Project Site and the listed airports, the Project would not have the potential to result in a safety hazard or excessive noise. Therefore no impact would occur.

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

Less Than Significant Impact.

Construction of the Project will not substantially impede public access or travel on public rights-of-way, and would not interfere with any adopted emergency response plan or emergency evacuation plan. The bulk of the work will be conducted on site. However, if temporary lane closures are needed, they would require Street Services approval.

In addition, there are no emergency services located within the immediate vicinity of the affected streets during construction (i.e. the streets surrounding the Site).

Disaster routes function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. Immediate emergency debris clearance and road/bridge repairs for short-term emergency operations will be emphasized along these routes.

According to the City, Van Nuys, is a selected disaster route.¹⁰⁷

According to the County, Van Nuys is a secondary disaster route.¹⁰⁸

The Project will not impede the disaster route and emergency access would be maintained at all times.

The Project would not cause permanent alterations to vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way. The Project Site is not within a Hillside Area.¹⁰⁹

The Project would comply with emergency evacuation requirements according to the LAMC and LAFD. Therefore, impacts would be less than significant.

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

No Impact.

A significant impact may occur if a project is located in proximity to wildland areas and would pose

¹⁰⁷ Los Angeles Safety Element, 2021 Update: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed August 23, 2022.

¹⁰⁸ Los Angeles County Department of Public Works, Disaster Route Maps, City of Los Angeles Valley Area: <https://dpw.lacounty.gov/dsg/DisasterRoutes/map/Los%20Angeles%20Valley%20Area.pdf>, accessed August 23, 2022.

¹⁰⁹ ZIMAS search: <http://zimas.lacity.org/>.

a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is not located in a Very High Fire Hazard Severity Zone¹¹⁰ or in the wildlands fire hazard Mountain Fire District.¹¹¹ The Project Site is not on the direct edge of a rural or wildland area. Therefore, no impact would occur.

Cumulative Impacts

Less Than Significant Impact.

Development of the Project in combination with the related projects could increase, to some degree, the risks associated with the use and potential accidental release of hazardous materials in the City. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in combination with the development proposals for each of those properties. Furthermore, each related project will be required to follow local, State, and federal laws regarding hazardous materials. With compliance with local, State, and federal laws pertaining to hazardous materials, cumulative impacts to hazardous materials would be less than significant and no mitigation measures are required.

¹¹⁰ ZIMAS search: <http://zimas.lacity.org/>.

¹¹¹ Los Angeles Safety Element, 2021 Update: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed August 23, 2022.

X. HYDROLOGY AND WATER QUALITY

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b.	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
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;	☐	☐	☐	☒
ii.	Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☐	☒
iii.	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv.	Impede or redirect flood flows?	☐	☐	☐	☒
d.	In flood hazard, tsunami, or seiches zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e.	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

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

Less Than Significant Impact.

A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. The National Pollutant Discharge Elimination System (NPDES) program establishes a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment to the maximum extent practicable. Pursuant to the NPDES, the Project is subject to the requirements set forth in the County's Standard Urban Stormwater Mitigation Plan (SUSMP). The goals and objectives of the SUSMP are achieved through the use of Best Management Practices (BMPs) to help manage runoff water quality. The City of Los Angeles has adopted the regulatory requirements set forth in the SUSMP of the Los Angeles Regional Water Quality Control Board (LARWQCB) under the City of Los Angeles Ordinance No. 173,494. BMPs typically include controlling roadway and parking lot contaminants by installing oil and grease separators at storm drain inlets; cleaning parking lots on a regular basis; incorporating peak-flow reduction and infiltration features (such as grass swales, infiltration trenches, and grass filter strips) into landscaping; and implementing education programs. The SUSMP identifies the

types and sizes of private development projects that are subject to its requirements.¹¹² The Project is subject to the requirements of the SUSMP, which are enforced through the City's plan approval and permit process.

Low Impact Development (LID) is a stormwater management strategy that seeks to prevent impacts of runoff and stormwater pollution as close to its source as possible. Ordinance No. 181,899 was adopted in 2011 to amend LAMC 64.70, the City's stormwater code, and expand the City's existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. LID is different from the previous SUSMP because it requires a larger scope of development and redevelopment projects to comply with stormwater measures, and incorporating new LID practices and measures. All development and redevelopment projects that create, add, or replace 500 square feet or more of impervious area need to comply with the LID Ordinance. Accordingly, the Project is subject to LID.

A project must comply with the LID Best Management Practices (LID BMPs) (determined on a case by case basis by Public Works), and if that is not feasible only then do SUSMP BMPs apply. Possible BMPs include 1. Infiltration Systems, 2. Stormwater Capture and Use, 3. High Efficiency Biofiltration/Bioretenion Systems, and 4. Combination of Any of the Above.

Construction

Demolition and construction activities at the Project Site have the potential to affect the quality of storm water runoff. Typically, runoff picks up pollutants as it flows over the ground or paved areas and carries these pollutants into the storm drain system or directly into natural drainages. There are three general sources of short-term construction-related stormwater pollution associated with the Project: 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. During construction, the Project Site would contain a variety of construction materials that are potential sources of stormwater pollution, such as adhesives, cleaning agents, landscaping, plumbing, painting, heat/cooling, masonry materials, floor and wall coverings, and demolition debris. Construction material spills can also be a source of stormwater pollution and/or soil contamination.

The project is expected to comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts and the City's Low Impact Development (LID) Ordinance. The purpose of the LID standards is to reduce the peak discharge rate, volume, and duration of flow through the use of site design and stormwater quality control measures. The LID Ordinance requires that the project retain or treat the first three-quarters of an inch of rainfall in a 24-hour

¹¹² Project applicants are required to prepare and implement a Standard Urban Stormwater Mitigation Plan when their projects fall into any of these categories: Single-family hillside residential developments; Housing developments of 10 or more dwelling units (including single family tract developments); Industrial /Commercial developments with one acre or more of impervious surface area; Automotive service facilities*; Retail gasoline outlets*; Restaurants* Parking lots of 5,000 square feet or more of surface area or with 25 or more parking spaces; Projects with 2,500 square feet or more of impervious area that are located in, adjacent to, or draining directly to designated Environmentally Sensitive Areas (ESA). <http://www.lastormwater.org/green-la/standard-urban-stormwater-mitigation-plan/>.

period. LID practices can effectively remove nutrients, bacteria, and metals while reducing the volume and intensity of stormwater flows.

Operation

The Project will not include industrial discharge to any public water system. Under existing conditions, runoff at the Project Site may contain typical urban pollutants such as automotive fluids (including oil and grease) commercial cleaning and landscaping pollutants discharged into the storm drainage system. Because there would be no substantial change in the type of runoff as a result of the Project (which would continue to have automobiles, cleaning supplies, and similar elements), urban contaminants that may be present in urban runoff from the Project Site would not differ substantially in type than that which currently exists. The parking for the Project would be located within the building and not subject to rain that can create runoff.

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

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

In addition, the Project would be subject to the provisions of the City's Low Impact Development (LID) Ordinance, which is designed to mitigate the impacts of increases in runoff and stormwater pollution as close to the source as possible. LID comprises a set of site design approaches and BMPs that promote the use of natural systems for infiltration, evapotranspiration and use of stormwater, as appropriate. The LID Ordinance will require the Project to incorporate LID standards and practices to encourage the beneficial use of rainwater and urban runoff, reduce stormwater runoff, promote rainwater harvesting, and provide increased groundwater recharge. In this regard, the City has established review procedures to be implemented by the Department of City Planning, LADBS, and Department of Public Works that parallel the review of the SUSMP discussed above. Incorporation of these features would minimize the increase in stormwater

runoff from the Project Site. The SUSMP consists of structural BMPs built into the Project for ongoing water quality purposes over the life of the Project. Additionally, because the Project Site does not currently operate under a SUSMP, implementation of the Project with a SUSMP would improve water quality leaving the Project Site compared to existing conditions. Therefore, impacts would be less than significant.

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

No Impact.

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

Groundwater was not encountered on the Site to 90 feet below Site grade.¹¹³ As the Project will be at grade, no dewatering (i.e., removal of groundwater) during construction is anticipated.

The nearest surface water in the vicinity is the Van Norman Bypass Reservoir, located approximately 5.5 miles north of the Project Site. No settling ponds, lagoons, surface impoundments, wetlands or natural catch basins are on the Project Site or nearby.

A public water system operated by the Los Angeles Department of Water and Power (LADWP) serves the Project Site. The sources of public water for the City of Los Angeles are surface water from California Water Project and Colorado River purchased through the Metropolitan Water District (MWD) and groundwater.¹¹⁴ The Project Site is located in an urbanized area of the City. The Project Site is primarily covered with hardscape. The Project will similarly occupy the entire Project Site with a new building. Thus, the Project would not be altering the amount of impervious surface that affects groundwater recharge.

Operation of the Project would not interfere with any groundwater recharge activities within the area. The Project Site is located in a highly urbanized area. The Project Site contains minimal areas of landscaping. Thus, the degree to which surface water infiltration and groundwater recharge currently occurs on-site is negligible. Even so, construction and operation of the Project would not substantially affect groundwater levels beneath the Project Site, including depleting groundwater supplies or resulting in a substantial net deficit in the aquifer volume or lowering of the local groundwater table.

The development of the Project will not involve direct groundwater withdrawal, and therefore, it will not deplete groundwater supplies. The Project will not interfere with groundwater recharge since current recharge is negligible due to the existing and proposed impervious surface covering the Project Site. Therefore, no impact would occur.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the

¹¹³ Geotechnical Evaluation, Geotechnologies, Inc., March 26, 2020.

¹¹⁴ LADWP, Water, Sources of Water: <https://www.ladwp.com/>, accessed March 24, 2020.

addition of impervious surfaces, in a manner which would:

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

No Impact.

Proper surface drainage is critical to the future performance of the Project. Saturation of soil can cause it to lose internal shear strength and increase its compressibility, resulting in a change in the designated engineering properties. Proper Site drainage would be maintained at all times.

The Project Site is primarily covered with hardscape. The Project will similarly occupy the entire Project Site with a new building and parking. Thus, the Project would not be altering the amount of impervious surface that affects drainage patterns. The Project Site is within a developed area of the City, which is connected to the municipally-owned separated storm sewer system (MS4); therefore, the development of the Project will not cause changes in existing drainage patterns or surface water bodies in a manner that could cause erosion or siltation. The Project Site is not near and will not alter a stream or river. Therefore, no impact would occur.

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

No Impact.

The Project Site is located in an urbanized area of the City. The Project Site is primarily covered with hardscape. The Project will similarly occupy the entire Project Site with a new building and parking. Thus, the Project would not be altering the amount of impervious surface that affects drainage patterns.

Surface water runoff under proposed conditions would comply with the City's LID Ordinance (Ordinance No. 181,899). Compliance with the LID Ordinance would ensure the site is developed with BMPs designed to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event (whichever is greater). As such, the volume of post-development surface water runoff would be reduced with the Project as compared to the existing conditions.

No flooding is expected to occur on- or off-site due to the relatively flat grades of the Project Site and the vicinity. The Project Site is also not near, nor would be altering, a stream or river. Therefore, no impact would occur.

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

Less Than Significant Impact.

A significant impact may occur if a project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving the Project Site. A project-related significant adverse effect would also occur if a project would substantially increase the probability that polluted runoff would reach storm drains. No natural watercourses exist on or in the vicinity of the Project Site. Water runoff flows toward the existing storm drain system on Van

Urban runoff discharged from municipal storm drains is one of the principal causes of water quality problems in most urban areas. Oil and grease from parking lots, pesticides, cleaning solvents, and other toxic chemicals can contaminate stormwater, which can then contaminate receiving waters downstream and, eventually, the Pacific Ocean. As discussed in the response to Question 10(a), the Project is required to comply with the NPDES program, LID Best Management Practices, as well as the LAMC. These regulations control water pollution by regulating point sources that discharge pollutants. Additional discussion of the construction and operation impacts is provided below.

Construction

Three general sources of potential short-term construction-related stormwater pollution associated with the Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth-moving activities which, when not controlled, may generate soil erosion and the transportation of pollutants via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials can effectively reduce the potential pollution of stormwater by these materials. The same types of common sense, “good housekeeping” procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes. Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze, or other fluids onto the construction site are also common sources of stormwater pollution and soil contamination. Earth-moving activities that can greatly increase erosion processes are another source of stormwater pollution contamination.

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. When properly designed and implemented, these “good-housekeeping” practices would reduce dust and erosion that may occur onsite and leaks from any construction equipment. The Project is required to comply with the LID Best Management Practices, which are determined on a case by case basis by the Department of Public Works. Approval will not be granted or issued until appropriate and applicable stormwater BMPS are incorporated into the Project design plans. Compliance with existing regulations would ensure the potential for construction water quality impacts are less than significant.

Operation

Activities associated with operation of the Project will not generate substances that could degrade the quality of water runoff. The deposition of chemicals by cars in the existing parking lot could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. By removing the existing parking lot and developing a mixed-use project, the type of urban runoff would likely improve in quality. The parking for the Project would be located in its own Parking Building and a surface lot. Therefore, the area subject to rain that can create runoff would be substantially reduced. In addition, impacts to water quality

115 Navigate LA, Storm Drains Layer: <http://navigatela.lacity.org/navigatela/>.

would be reduced since the Project must comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles and the SWRCB. Furthermore, required design criteria, as established in the SUSMP for Los Angeles County and the City of Los Angeles (such as LID), would be incorporated into the Project to minimize the off-site conveyance of pollutants. Compliance with existing regulations would ensure operational water quality impacts are less than significant.

iv. Impede or redirect flows?

No Impact.

Lands designated as special flood hazard areas that are identified by the Federal Emergency Management Agency (FEMA) and published in the Flood Insurance Rate Map (FIRM) to establish the flood risk premium zone. These areas are subject to inundation by a flood having a one-percent or greater probability of being equaled or exceeded during any given year. This flood, which is referred to as the 1% annual chance flood (or base flood), is the national standard on which the floodplain management and insurance requirements of the National Flood Insurance Program (NFIP) are based. According to FEMA the Flood Insurance Rate Map, the Project Site is located within Flood Zone X, which is an area determined to be outside the 0.2 percent annual chance floodplain.¹¹⁶

Additionally, the Project Site is not located within a City-designated 100-year floodplain.¹¹⁷

The Project would not be located in a 100-year flood hazard area according to the Los Angeles General Plan Safety Element map.¹¹⁸

The Site is not within a Flood Zone.¹¹⁹

The Project Site is not located within an area designated as a 100-year flood hazard area.¹²⁰

Therefore, no impact would occur.

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

No Impact.

Seiches are oscillations generated in enclosed bodies of water that can be caused by ground shaking associated with an earthquake. Mitigation of potential seiche action has been implemented by the LADWP through regulation of the level of water in its storage facilities and

¹¹⁶ FEMA, Flood Map Service Center: <https://msc.fema.gov/portal>, August 23, 2022.

¹¹⁷ Los Angeles Safety Element, 2021 Update: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed August 23, 2022.

¹¹⁸ Los Angeles Safety Element, 2021 Update: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed August 23, 2022.

¹¹⁹ ZIMAS search: <http://zimas.lacity.org/>.

¹²⁰ NavigateLA, FEMA Flood Hazard layer: <http://navigateLA.lacity.org/navigateLA/>, August 23, 2022.

providing walls of extra height to contain seiches and prevent overflows. Dams and reservoirs are monitored during storms and measures are instituted in the event of potential overflow.¹²¹

The Project is not located within an area potentially impacted by a tsunami.¹²²

There are no major water-retaining structures located immediately upgradient from the Project Site. Therefore, flooding from a seismically-induced seiche is considered unlikely.

In addition to the low risk of flooding, the Project includes LID requirements for capture and use and/or biofiltration system and a stormwater conveyance system, which would be improve upon the existing site, which is devoid of treatment and on-site detention. Therefore, the Project would not risk release of pollutants due to inundation by flood hazards.

Therefore, no tsunami or seiches would be expected to impact the Project Site that would risk release of pollutants due to Project inundation.

No impact would occur.

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

No Impact.

The Project would comply with LAMC Chapter VI, Article 4.4, Stormwater and Urban Runoff Pollution Control and would be required to obtain coverage under the NPDES General Construction Activity Permit. In addition, the Project would not adversely impact a groundwater management plan because the Project would be developed with Best Management Practices to reduce surface water runoff and would not otherwise impede groundwater replenishment in the basin.

The Project would comply with the City's NPDES General Construction Activity Permit during construction and designed in conformance with the City's LID Ordinance for new development. Therefore, neither construction nor operation of the Project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

No impact would occur.

Cumulative Impacts

Less Than Significant Impact.

The related projects would potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff within the local vicinity of the Project Site. Pursuant to the LID Ordinance, however, related projects would be required to capture and manage the first three-quarters of an inch of runoff flow during storm events as defined in the City's LID BMPs, through one or more of the City's preferred LID improvements: on-site infiltration, capture and reuse, or

121 Page II-16, Los Angeles General Plan Safety Element, https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed August 23, 2022.

122 ZIMAS search: <http://zimas.lacity.org/>.

biofiltration/biotreatment BMPs, to the maximum extent feasible.

Further, the related projects would be subject to the NPDES permit requirements for both construction and operation. Each project greater than one-acre in size would be required to develop a SWPPP and would be evaluated individually to determine appropriate BMPs and treatment measures to avoid or minimize impacts to water quality. Smaller projects would be minor infill projects with drainage characteristics similar to existing conditions, with negligible impacts. In addition, the City of Los Angeles Department of Public Works reviews all construction projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available.

The cumulative impacts context for flood hazards is the corporate boundary of City of Los Angeles, which provides emergency response services for flood events and participates in the National Flood Insurance Program (NFIP). The NFIP is a Federal program enabling property owners in participating communities to purchase protection against property losses due to flooding. All related projects are subject to restrictions and requirements as part of the City's existing permitting process and a detailed review of the City of Los Angeles General Plan Safety Element would be conducted as part of the plan check process. Related projects within the 100-year flood plain or floodway would be required to implement appropriate flood plain management measures in the design of new buildings. Compliance with these existing regulatory requirements would ensure the any related projects would not place housing within a flood hazard area without incorporating proper measures and reducing this impact to less than significant and would not be cumulatively considerable.

Similarly, the Project would comply with applicable NPDES and City requirements, which would include the use of BMPs during construction and operation of the Project as detailed in a SWPPP and in the City's LID ordinance. The Project would include rainwater harvesting and/or bioinfiltration flow-through planters as a BMP.

The Los Angeles Department Public Works would review the Project to ensure that sufficient local and regional drainage capacity is available. The Project would not be located in a 100-Year or 500-Year flood plain or near an inundation area subject to seiche or tsunami. The Project's contribution to cumulative impacts to hydrology and water quality and flooding hazards would not be cumulatively considerable. Impacts would be less than significant.

XI. LAND USE AND PLANNING

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☒	☐

a) Would the project physically divide an established community?

No Impact.

The Project is not of a scale or nature that would physically divide an established community or impede access between parts of the community. The Project is not affecting any right-of-ways. The Project will be built on an existing urban infill site and is contiguous and bounded by streets. In addition, the Site is not large enough to encompass an established community.

The Project would not cause any permanent street closures, block access to any surrounding land use, or cause any change in the existing street grid system. Since the Project would be developed within a long-established urban area, the Project would not physically divide an established community by creating new streets or by blocking or changing the existing street grid pattern. Since the Project would not physically disrupt or divide the surrounding established community.

The Project's uses are compatible with the residential and commercial uses in the area. Throughout the City and near the Project Site, there are similar uses, especially in dense areas, such as Downtown Los Angeles, Hollywood, and West Long Angeles. Therefore, no impact would occur.

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

Less Than Significant Impact.

A significant impact may occur if a project is inconsistent with applicable land use plans or zoning designations and would cause adverse environmental effects, which these regulations are designed to avoid or mitigate.

The legal standard that governs consistency determinations is that a project must only be in "harmony" with the applicable land use plan to be consistent with that plan. (See *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 717-18 [upholding a city's determination that a subdivision project was consistent with the applicable general plan]). As the Court explained in *Sequoyah*, "state law does not require an exact match between a proposed subdivision and the applicable general plan." To be "consistent" with the general plan, a project must be "compatible with the objectives, policies, general land uses, and programs specified in

the applicable plan,” meaning, the project must be “in agreement or harmony with the applicable plan.” (see also *Greenebaum v. City of Los Angeles* (1984) 153 Cal.App.3d 391, 406; *San Franciscans Upholding the Downtown Plan, supra*, 102 Cal.App.4th at p. 678.) Further, “[a]n action, program, or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment.” (*Friends of Lagoon Valley v. City of Vacaville* (2007) 154 Cal.App.4th 807, 817.) Courts also recognize that general plans “ordinarily do not state specific mandates or prohibitions,” but instead provide “policies and set forth goals.” (*Friends of Lagoon Valley*).

Consistency with Regional Plans

Southern California Association of Governments (SCAG)

Regional Transportation Plan (RTP)

The goals and policies of the RTP address projects considered to be regionally significant. To monitor regional development, CEQA requires regional agencies, such as SCAG, to review projects and plans throughout its jurisdiction. In the Southern California region, with exception of the County of San Diego, SCAG acts as the region’s “Clearinghouse,” and collects information on projects of varying size and scope to provide a central point to monitor regional activity.

The Project is not considered to be a regionally significant project pursuant to CEQA Guidelines 15206, which SCAG uses to determine regionally significant projects.¹²³ The threshold size for a residential development is more than 500 dwelling units. The threshold size for a commercial building is employing more than 1,000 persons or more than 250,000 square feet.

The Project does not meet the residential development threshold.

The Project would support the goals of the RTP/SCS to maximize the productivity of the region’s transportation system as well as protect the environment and health of the region’s residents by improving air quality and encouraging active transportation (e.g., bicycling and walking). The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site.

In addition, the Project Site is served by a variety of nearby mass transit options, including a number of bus lines. The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project Site’s location within a SCAG-designated HQT and TPA, as defined PRC Section 21099. In addition, the Project would provide bicycle parking spaces for the proposed uses that would serve to promote walking and use of bicycles. The Project would also include adequate parking to serve the proposed uses and would provide charging stations to serve electric vehicles. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and opportunities for walking and biking. SB 375 requires MPOs such as SCAG to revise and update their RTPs and SCS’ periodically. On September 3, 2020, SCAG’s

123 CEQA, Section 15206, Projects of Statewide, Regional, or Areawide Significance: http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/Handout_CCR_15206_Statewide,Regional,Areawide_052007.pdf, accessed April 3, 2020.

Regional Council formally adopted the 2020-2045 RTP/SCS (also known as Connect SoCal). The 2020-2045 RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. The 2020-2045 RTP/SCS outlines more than \$638 billion in transportation system investments through 2045. It was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. The 2020-2045 RTP/SCS includes strategies for accommodating projected population, household and employment growth in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices with a reduced dependence on automobiles and an increase growth in walkable, mixed-use communities and HQTAs and by encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region.

Project Consistency Discussion

A detailed discussion of the Project's consistency with the 2020-2045 RTP/SCS is included in **Section 3** (SCEA Criteria and Transit Priority Project Consistency Analysis), as well as in **Section 5.8** (Greenhouse Gas Emissions). As discussed there, the Project would be substantially consistent with the 2020-2045 RTP/SCS, including the general use designation, density, and building intensity identified in the 2020-2045 RTP/SCS for the area in which the Project Site is located. Therefore, the Project is consistent with the 2020-2045 RTP/SCS.

City of Los Angeles General Plan

State law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals.¹²⁴ The City's General Plan is a dynamic document consisting of 11 elements, including 10 citywide elements (Air Quality Element, Conservation Element, Historic Preservation and Cultural Resources Element, Housing Element, Infrastructure Systems Element, Noise Element, Open Space Element, Public Facilities and Services Element, Safety Element, and Transportation Element) and the Land Use Element, which provides individual land use consistency plans for each of the City's 35 Community Plan Areas.

City of Los Angeles General Plan Framework Element

The eastern side is zoned commercial, the [Q] C2-2-CDO zone in Height District 2, with a General Plan land use designation of Regional Commercial. Residential and commercial land uses are both permitted, and R5 density and uses are allowed pursuant to LAMC Section 12.22A-18 (a). This side will accommodate a new residential building with ground floor retail.

¹²⁴ California Government Code Section 65300.

Table 5.11-1, Framework Element, lists the goals, objectives, policies that apply to developers in collaboration with local government. As shown, the Project will be consistent with the applicable policies for each land use (within a developer's control or developer focused).

**Table 5.11-1
Framework Element**

Goals, Objectives, Policies	Discussion
Land Use Chapter	
Section 2: Issue One: Distribution of Land Use	
Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more liveable [sic] city.	No Conflict. While this is a citywide goal, the Project would revitalize an existing under-utilized site by providing a new mixed-use building with residential and retail uses. The Project would be developed with sustainability features and landscaped open space and recreational areas for both the public and Project residents. The Project would be well-served by public transit, including Metro and LADOT bus lines. The Project would create a new development that would contribute to a transit-oriented mixed-use neighborhood of the City.
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	Consistent. The Project furthers this objective by locating a mixed-use development in an area of the city designated as Regional Commercial. Specifically, the project mixes on one site multi-family residential and neighborhood-serving commercial uses. This diversity of uses will support the continuing needs of existing and future project residents, businesses, and visitors to the Panorama City area.
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.	Consistent. The Project furthers this objective by providing a high-quality mixed-use development that incorporates common open space and recreational amenities. The project is well-sited, with direct access to regional transit and close proximity to neighborhood-serving commercial and retail uses. These features, plus the provision of ample bicycle parking for both residents and visitors, will facilitate a mode shift away from single-occupant automobile use to increased walking, transit use, and travel by bicycle. Consequently, the project will further a reduction in vehicular trips, vehicle miles traveled, and air pollution. It will help mitigate the harmful effects of climate change.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, regional, and downtown centers as well as along	Consistent. The Project furthers this objective by locating a mixed-use development in an area of the city designated as Regional Commercial. The project will face Van Nuys Boulevard, in an area that is well-served by

primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	existing regional bus transit and will be served by future light rail. The project helps conserve existing neighborhoods and related districts by accommodating citywide demand for new housing and business development in a Regional Commercial center and away from existing single-family and other conservation districts. The Framework calls this the city's "directed growth strategy."
Section 3. Issue 2: Uses, Density, and Character – General Commercial	
GOAL 3F Mixed-use centers that provide jobs, entertainment, culture, and serve the region.	Consistent. The Project would include mixed-use development at a regional commercial node, near the intersection of Roscoe and Van Nuys.
Objective 3.10 Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.	Consistent. The Project would include residential and commercial uses of similar in scale to those found in the area
Housing Chapter	
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	No Conflict. While this is a citywide objective, the Project would support its implementation. Specifically, as discussed in Objective 3.2 above, the Project Site is located in a designated HQTa and TPA. In addition, the ground floor retail use and streetscape improvements proposed by the Project would promote walkability in the vicinity of the Project Site. While the Project Site is not immediately adjacent to high-density residential neighborhoods, the Project would be designed to be similar and compatible in density and scale of the surrounding areas.
Open Space and Conservation Chapter	
Goal 6A: An integrated citywide/regional public and private open space system that serves and is accessible by the City's population and is unthreatened by encroachment from other land uses.	No Conflict. While this is a citywide/regional goal, the Project would contribute to the public and private open space system by designating publicly-accessible landscaped open space on the ground floor and recreational amenities and open space areas for Project residents. Furthermore, the Project would not conflict with the public and private open space system because it would not encroach upon existing open space.
Policy 6.4.7: Consider as part of the City's open space inventory of pedestrian streets, community gardens, shared school playfields, and privately-owned commercial open spaces that are accessible to the public, even though such elements fall outside the conventional definitions of "open space." This will help address the open space and outdoor recreation needs of	No Conflict. While this is a citywide policy, the Project would support its implementation by providing open space as set forth by the LAMC.

communities that are currently deficient in these resources.	
Economic Development Chapter	
Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.	No Conflict. The Project would support this objective by providing retail uses to complement the employment base of the Community Plan area, help meet needs of local residents, and foster continued economic investment. In addition, the Project Site would have convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips, VMT, and air pollution to ensure maximum feasible environmental quality.
Policy 7.2.3: Encourage new commercial development in proximity to rail and bus transit corridors and stations.	No Conflict. The Project would develop retail uses in a designated HQTa and TPA. The Project would be well-served by public transit, including Metro and LADOT bus lines.
Policy 7.2.5: Promote and encourage the development of retail facilities appropriate to serve the shopping needs of the local population when planning new residential neighborhoods or major residential developments.	Consistent. As discussed in Objective 7.2 and Policy 7.2.3 above, the Project would include retail uses that would serve Project residents, employees, visitors, and the local neighborhood, which would reduce VMT.
Objective 7.9: Ensure that the available range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to transportation, to accommodate future population growth and to enable a reasonable portion of the City's work force to both live and work in the City. Policy 7.9.2: Concentrate future residential development along mixed-use corridors, transit corridors and other development nodes identified in the General Plan Framework Element, to optimize the impact of City capital expenditures on infrastructure improvements.	No Conflict. The Project would provide dwelling units in a designated HQTa and TPA. The Project would be well-served by public transit, including Metro and LADOT bus lines. Accordingly, the Project would concentrate future residential development along a mixed-use/transit corridor to optimize the impact of City capital expenditures on infrastructure improvements.
Infrastructure and Public Services Chapter	
Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.	No Conflict. The Project would implement a SWPPP as required under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (Order No. 2009-0009-DWQ, as well as subsequent amendments 2010-0014-DWQ and 2012-0006-DWQ). The Project would implement best management practices (BMPs) and other erosion control measures to minimize the discharge of pollutants in stormwater runoff. In addition, during operation, the Project would include BMPs to collect, detain, treat, and

	discharge runoff on-site before discharging into the municipal storm drain system as part of the Standard Urban Stormwater Mitigation Plan (SUSMP). The Project does not include uses that handle or generate hazardous substances.
Goal 9B: A stormwater management program that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations. Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	No Conflict. Refer to Policy 9.3.1 above.
Objective 9.10: Ensure that water supply, storage, and delivery systems are adequate to support planned development.	No Conflict. Based on LADWP's demand projections provided in its 2015 UWMP, LADWP would be able to meet the water demand of the Project as well as the existing and planned future water demands of its service area. Furthermore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. Therefore, the Project would not conflict with this objective and no new water supply, storage, and delivery systems are required to support the development.
Mobility Element 2035	
Policy 3.3, Land Use Access and Mix: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations and other neighborhood services.	Consistent. The Project implements this policy by locating a mixed-use development in the C2 Zone, in an area designated as Regional Commercial. As noted, the project is transit accessible and also within walking distance of a wide variety of commercial, retail, nonprofit, governmental, and institutional employers. The area includes a diverse array of neighborhood-serving uses, including retail and food service, that will be available for the benefit of the residents of the project. The project's location will promote pedestrian activity and transit use, thus contributing toward a reduction in vehicular trips.
Policy 3.8, Bicycle Parking: Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.	Consistent. The Project implements this policy by providing a secure bicycle parking facility that can accommodate 146 bicycles, 17 for short-term (13 for residential uses and 4 for commercial uses) and 129 for long-term parking for the proposed buildings. The allocation for residential bicycle parking is 125, and 4 for nonresidential. The bicycle parking facility will be conveniently located adjacent to the automobile parking structure, directly adjacent to the pedestrian pathway to Van Nuys Boulevard.
Housing Element 2013-2021	
Goal 1: A City where housing production and preservation result in an adequate supply of	Consistent. The Project helps achieve this goal by providing 200 new market-rate rental units in a building

ownership and rental housing that is safe, healthy, sanitary and affordable to people of all income levels, races, ages, and suitable for their various needs.	that will comply with all applicable building codes, thus providing safe, healthy and sanitary housing. Table 6.1 of the Housing Element identifies a citywide need for 59,559 new construction units from January 1, 2014 through September 30, 2021, including 46,500 units “above moderate income.” The project’s provision of new rental housing helps fill this identified citywide need.
Objective 1.1: Provide an adequate supply of rental and ownership housing for households in order to meet current and projected needs.	Consistent. The Project furthers this objective by providing 200 new market-rate rental units that will help fill current and projected needs, as set forth in Table 6.1 of the Housing Element 2013-2021.
Policy 1.1.4: Expand opportunities for residential development, particularly in designated Centers, Transit Oriented Districts and along Mixed-Use Boulevards.	Consistent. The Project implements this policy by constructing a mixed-use development with ground floor commercial uses, located in an area designated as Regional Commercial, in a walkable mixed-use district with close proximity to transit.
Policy 2.2.3: Promote and facilitate a jobs/housing balance at a citywide level.	Consistent. The Project implements this policy by locating a high-density, multi-family residential development in the C2 zone, in an area of the city designated as Regional Commercial. The project site is transit accessible and within walking distance of a wide variety of commercial, retail, non-profit, governmental, and institutional employers. It thus improves the jobs/housing balance at both the local and citywide levels.
Objective 2.4: Promote livable neighborhoods with a mix of housing types, quality design and a scale and character that respects unique residential neighborhoods in the City.	Consistent. The Project furthers this objective by constructing a multi-family residential development with a wide variety of unit sizes and configuration. The new building is well-designed with an inner courtyard. It substantially conforms to the guidelines and standards set forth in the Panorama City Community Design Overlay District. It includes ample open space and recreational amenities, including a pool, that promote livability. It furthers the development of an emerging mixed-use district along Van Nuys Boulevard. The new building is architecturally compatible with and of a scale appropriate to this neighborhood, and its wide variety of low- and mid-rise buildings.
Policy 2.4.2: Develop and implement design standards that promote quality residential development.	Consistent. The Project implements this policy by ensuring that this higher-density residential development substantially complies with the Panorama City Community Design Overlay District’s guidelines and standards.
https://planning.lacity.org/cwd/framwk/contents.htm	

Mobility Plan 2035

The Project would support the City's policy to provide for safe passage of all modes of travel during construction by preparing and implementing a Construction Traffic Management Plan that would incorporate safety measures around the construction site to reduce the risk to pedestrian activity near the work area; minimize the potential conflicts between construction activities, street traffic, transit stops, and pedestrians; and reduce congestion to public streets and highways. The Project would ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

During operation, the Project would recognize all modes of travel by providing adequate vehicular and pedestrian access and providing bicycle facilities. Specifically, the Project would include bicycle parking spaces. The Project would also enhance pedestrian activity through building design and proposed streetscape amenities by providing ground-level, retail use. Streetscape amenities provided by the Project would include street trees and pedestrian-scale lighting fixtures and elements. Additionally, given the location of the Project Site along and in proximity to major transit corridors, the Project would provide all residents, guests, employees, and patrons of the on-site uses convenient access to transit services. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Mobility Plan.

Conservation Element

The Conservation Element primarily addresses the preservation, conservation, protection, and enhancement of the City's natural resources. The Project Site is currently developed with low-rise commercial buildings and surface parking lot and does not contain any natural resources. Landscaping within the Project Site is limited. Due to the improved nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. No riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site or in the immediate vicinity of the Project Site. The areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within and surrounding the Project Site which provide linkages to natural open spaces areas and which may serve as wildlife corridors. Accordingly, development of the Project would not interfere substantially with any established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity of the Project Site. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Conservation Element.

Housing Element

The Project would provide a variety of housing types (i.e., studio, one-, two-bedroom units) in an area that is pedestrian-friendly and served by public transit. Specifically, the Project would develop 200 new multi-family residential units. In addition, the Project would encourage the location of new multi-family housing to occur in proximity to transit by locating the Project in a designated HQT and TPA. The Project would also promote the construction of green buildings

by incorporating sustainable design features, including energy conservation, water conservation, alternative transportation programs, a pedestrian- and bicycle-friendly site design, and waste reduction measures. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Housing Element.

Mission Hills – Panorama City – North Hills Community Plan

The Project Site is located within the Mission Hills – Panorama City – North Hills Community Plan (Community Plan), which was adopted in June 1999.¹²⁵ **Table 5.11-2, Community Plan**, sets forth the Community Plan’s objectives and policies for commercial land use and discusses the Project’s consistency and applicability with each of them. The Project would not conflict with any of the goals, objectives, and policies of the Community Plan. The Project would be consistent with all applicable policies related to the buildings siting, location, uses, and design features.

The Project would also implement and be consistent with the applicable goals and policies of the General Plan and the General Plan Framework. The Project includes a mix of urban infill uses (residential, commercial) with bicycle parking and is located near public transit. Additionally, the Project would promote economic development by providing a number of construction and permanent jobs. The Project supports and promotes a pedestrian oriented streetscape around the Site.

**Table 5.11-2
Community Plan**

Objectives, Policies	Discussion
Objective 1.2: To locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities.	Consistent. The Project furthers this objective by being located in a walkable mixed-use district that includes a diverse array of office, retail, commercial and other uses, including residential. Given the new building's location in a walkable mixed-use district and its proximity to regional bus transit (and future light rail) the project will promote pedestrian activity and transit use, thus contributing toward a reduction in vehicular trips.
Policy 1.2.1: Locate higher residential densities near commercial centers and major bus routes where public service facilities, utilities, and topography will accommodate this development.	Consistent. The Project implements this policy by creating a high-density, unified residential development in an area designated as Regional Commercial. The immediate area includes an elementary school, non-profit centers and facilities, and a governmental building. It is a mixed-use project that faces Van Nuys Boulevard, and thus it is in close proximity to regional bus transit and future light rail.
Policy 1.3.1: Seek a high degree of architectural compatibility and landscaping for new infill development to protect the character and scale of existing residential neighborhoods.	Consistent. The Project implements this policy by constructing a new residential building on a currently vacant, urban infill opportunity site, adjacent to an existing 14-story adaptively reused residential tower.

¹²⁵ Community Plan: https://planning.lacity.org/odocument/fee68461-843f-48da-92e9-49a01d1f09e3/Mission_Hills-Panorama_City-North_Hills_Community_Plan.pdf

	The Project will provide extensive landscaping and open space amenities that will serve the residents of both the new and existing buildings. The new building has been designed to be architecturally compatible with the existing, mid-century design of the existing building, and will substantially conform to the guidelines and standards set forth in the Panorama City Community Design Overlay District.
Policy 1.5.1: Promote individual choice in type, quality, price and location of housing.	Consistent. The Project implements this policy by providing 200 new dwelling units in a mixed-use building with ground-floor retail. It locates multi-family housing in a Regional Commercial center, and will include a diverse array of dwelling unit types and sizes, with varying prices.
Policy 1.5.2: Promote housing in mixed use projects in transit corridors, pedestrian oriented districts, and transit-oriented districts.	Consistent. The Project implements this policy by locating a mixed-use project in the Panorama City Community Design Overlay District, which is intended to “attract pedestrians as well as vehicular traffic, and facilitate ease of pedestrian movement to balance traffic activity and enhance business success in Panorama City.” The project substantially conforms with the district’s guidelines and standards. It provides ground-floor commercial and retail uses that will enhance and contribute to the district’s existing pedestrian orientation. It is located in the Van Nuys Boulevard transit corridor.
Policy 1.5.3: Ensure that new housing opportunities minimize displacement of the residents.	Consistent. The Project implements this policy by being built on existing open space and a surface parking lot. No existing residential buildings or units will be demolished. As such, the project will result in zero displacement of existing residents.
Policy 2.2.3: Require that mixed use projects and development in pedestrian oriented districts be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses.	Consistent. The Project implements this policy by substantially conforming to the guidelines and standards in the Panorama City Community Design Overlay District.
Policy 2.2.4: Require that the first floor of street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented districts, incorporate retail and service oriented commercial uses.	Consistent. The Project implements this policy through a mixed-use development with neighborhood-serving commercial uses. These will be located along the ground floor with minimal setback. This will reinforce the pedestrian orientation of Panorama City.
Source: Community Plan: https://planning.lacity.org/odocument/fee68461-843f-48da-92e9-49a01d1f09e3/Mission_Hills-Panorama_City-North_Hills_Community_Plan.pdf	

ZI-2321 Panorama City Community Design Overlay District (CDO)

The Project is located in the Panorama City Community Design Overlay District, established pursuant to LAMC Section 13.08 and Ordinance No. 175550, effective on November 18, 2003. The overlay district's purpose, to be carried out through 26 guidelines and 73 standards, includes several goals, including "to promote storefront design that contributes to an attractive commercial center, creates a desirable community identity, and invites pedestrian interest and activity." The design overlay plan created for the project ensures that it substantially conforms with these guidelines and standards, thus ensuring that the project is compatible with existing and future development on adjacent and neighboring properties.

Ordinance No. 175550 also imposed three permanent [Q] Conditions on new development within the Panorama City Community Design Overlay District. These [Q] Conditions mandate additional restrictions concerning auto-related uses; direct pedestrian access; and building-mounted signage. The Project will thus:

- (a) Not include any auto-related uses, as defined in the Ordinance;
- (b) Provide a direct pedestrian pathway from the Van Nuys Boulevard public right-of-way. Specifically, the project will provide direct street access to the ground floor commercial uses. Residents and their guests will also have direct street access to the residential portions of the new mixed-use building; and there will be a large public gate that will be open during regular business hours.
- (c) Building-mounted signage will not total more than two square feet per linear foot of building frontage. The applicant has submitted a signage plan in compliance with Guideline 20 of the Panorama City Community Design Overlay District.

As the Project will comply with all three [Q] conditions, it is and will be compatible with existing and future development on adjacent and neighboring properties.

The two new main buildings will be oriented toward the street, with minimal setback, ensuring that they fit in with the area's existing pattern of façade frontages and building orientations, as well as its prevailing modern design aesthetic. The refined building materials and finishes, the use of smooth stucco in complementary shades, the varying placement of windows and other wall openings, the generous expanses of glass, will all serve to create a unifying theme that harmonizes with the existing adaptive reuse tower and other nearby buildings and uses.

A design strategy that links together all parts of the site through common architectural features, while also ensuring that the project blends in with the neighborhood, has been used. Landscaped buffers will smooth the edges between the project and adjacent uses. The approach to lighting, privacy walls, location of surface parking and loading, and screening of mechanical equipment, will ensure that the project is further compatible with nearby buildings. Most existing surface parking will be re-located to a new parking building on the opposite side of the site, and away from the street-oriented residential and retail uses. The project's sign program will help carry out one of the CDO District's design principles, "simplicity through reduction of clutter."

As stated below, the Project specifically complies with the relevant CDO Guidelines and Standards:

Part One. Site Planning. The Overlay District includes guidelines and standards intended to carry out certain goals and principles related to site planning. The following discussion demonstrates how the project substantially complies with these guidelines and standards.

GUIDELINE 1: BUILDING SETBACK. *Provide for continuity in the existing street edge either by placing buildings on the front lot line or by creating a visible and functional pedestrian pathway from the street edge to the front entrance of the building.*

The proposed project substantially complies with Guideline 1. The new mixed-use building is placed near the front lot line of Van Nuys Boulevard. It provides continuity to the existing street edge since the existing adaptive reuse tower is placed near the front lot lines of both Van Nuys Boulevard and Titus Street. The setbacks for both the new and existing buildings are thus minimal and consistent with the pattern of frontages along this part of Van Nuys Boulevard.

Standard 1: Enhancing the Street Edge. *Where a building is separated from the street edge by a parking lot, there should be architectural or landscape elements such as stone or masonry gateways, wood trellises, low walls, piers, bollards, arbors, hedges and trees within the buffer defining a pedestrian gateway to the site. There should also be a landscaped path leading from the gateway to the entrance of the building.*

The proposed project substantially complies with Standard 1. When the project is built out, none of the three main buildings on the site will be separated from the street edge by a parking lot. Street edges along the entire perimeter of the site will be softened, by new trees and planters along Van Nuys Boulevard, and a five-foot wide landscaped buffer along Titus Street.

GUIDELINE 2: PEDESTRIAN ENTRANCE. *Provide direct pedestrian access to and from public streets and parking areas, as well as from parking areas to the stores.*

The proposed project substantially complies with Guideline 2. The project includes a long pedestrian walkway that bisects the site, starting on the edge of Van Nuys Boulevard and going in a straight line all the way to the new parking and warehouse building.

Standard 2A: Front Pedestrian Entrance. *Where businesses are built to the front property line, pedestrian entrances should be provided at the street frontage of the building.*

The proposed project substantially complies with Standard 2A. Pedestrian entrances to the new building's leasing office and its two retail spaces will be provided directly off of Van Nuys Boulevard. Persons parking in either the new parking structure or the small, surface lot can access both the new building and the existing tower through the pedestrian walkway.

Standard 2B: Loading Areas. *Loading areas should be designed and located where there will be minimal negative impact on pedestrians, the flow of traffic, and on adjacent residential uses. Preferable location would be the rear of the establishment.*

The proposed project substantially complies with Standard 2B. The loading area is properly located in the middle of the site, between the new parking and warehouse building and the existing tower. This area also includes surface parking and a mechanical pad. Given its location away from the street edge, and the provision of privacy screening, the loading area will have no negative impact on pedestrians or adjacent residential uses, nor will it impede the flow of traffic.

Standard 2C: Pedestrian and Vehicular Conflicts. Vehicular ingress and egress should, when possible, be located off of a side street or an alley in order to minimize pedestrian and vehicular conflicts.

The proposed project substantially complies with Standard 2C. Vehicular ingress and egress to the new parking building will be provided through two entrances/exits directly off of Titus Street, a designated Local Street that intersects with Van Nuys Boulevard, a designated Boulevard II. Access to the surface parking lot will also be off of Titus Street.

Standard 2D: Pedestrian Walkways. Parking areas should be designed to include landscaped pedestrian walkways, preferably located between parking rows. They should be incorporated into the entire walkway system of the project.

The proposed project substantially complies with Standard 2D. The small surface parking lot, with 12 spaces, will be landscaped and include 13 shade trees. The design of the ground lot provides for walkways that also connect to the project site's pedestrian pathway. This will create an integrated walkway system that will serve the entire unified development.

GUIDELINE 3: PARKING. Provide for continuity of the Panorama City street environment by screening parking lots placed between buildings and adjacent to the public right-of-way through use of architectural elements and landscaping.

The proposed project substantially complies with Guideline 3. A landscaped buffer will separate the sidewalk from the surface parking lot and the new parking building along the entire length of Titus Street. Unobtrusive privacy screening and walls will obscure the visibility of the lot from the public-right-of-way.

Standard 3A: Buffer Landscaping for Narrow Lots. Parking lots on parcels which are 75 feet or less in width should be separated from the adjacent public right-of-way by a minimum continuous landscape buffer which is 7 percent of the lot's width. Breaks may be provided for pedestrian access only. One fifteen-gallon tree should be planted for every 30 lineal feet of parking lot frontage.

Standard 3A does not apply to the proposed project. The site is greater than 75 feet in width.

Standard 3B: Buffer Landscaping for Standard Lots. Parking lots on parcels which are more than 75 feet in width should be separated from the adjacent public right-of-way by a minimum continuous 5-foot wide landscape buffer. Breaks may be provided for pedestrian access only. One fifteen-gallon tree should be planted for every 30 lineal feet of parking lot frontage.

The proposed project substantially complies with Standard 3B. The landscaped buffer that separates Titus Street from the small surface parking lot and the new parking and warehouse building is continuous. It is five feet in width. As the Landscape Plan shows, one fifteen-gallon tree shall be planted for every 30 lineal feet of the parking lot's frontage along Titus.

Standard 3C: Landscaping Wall Height. Surface parking lots adjacent to Van Nuys Boulevard should be screened by a solid wall located within and integrated with the landscape buffer and having a continuous height of three and a half feet.

The proposed project substantially complies with Standard 3C. A surface parking lot will not be located adjacent to Van Nuys Boulevard.

GUIDELINE 4: CONSISTENCY OF MATERIALS. *Use materials that complement existing buildings when freestanding walls are used to provide security, screening and privacy. Materials may include masonry and wrought iron, with incorporated landscape.*

The proposed project substantially complies with Guideline 4. The project utilizes a consistent architectural theme to create a unified development. Materials and finishes have been carefully selected to complement the mid-century modern aesthetic of the existing adaptive reuse tower. This theme extends to the site's freestanding walls, both street-fronting and on the site's interior. The materials and finishes that will be utilized are green tinted vision glass with clear anodized aluminum frames, gray smooth plaster, black smooth plaster light gray tile, and dark gray tile.

Standard 4A: Freestanding Wall Type. *If solid walls are used, they should be decorative and include graffiti-resistant material.*

The proposed project substantially complies with this Standard 4A. Solid walls on the site will be attractively designed, consistent with this unified development's overall design theme. Graffiti-resistant material will be consistently used. A layer of anti-graffiti film will be applied on glass as well as an anti-graffiti coating on stucco and tile surfaces.

Standard 4B: Chain-link Fence. *Chain link fences should be permitted temporarily only at new construction sites, and should be removed prior to any certificate of occupancy being granted by the Department of Building and Safety.*

The proposed project substantially complies with Standard 4B. The applicant shall comply with all conditions and requirements imposed by the Department of Building and Safety. Any chain link fencing that the Department temporarily permits shall be removed prior to the granting of any certificate of occupancy.

Standard 4C: Prohibited Fence Materials. *Non-decorative walls, corrugated metal, or other types of solid metal and rustic wood fences are strongly discouraged.*

The proposed project substantially complies with Standard 4C. The project utilizes a consistent architectural theme to create a unified development. Materials and finishes have been carefully selected to complement the mid-century modern aesthetic of the existing adaptive reuse tower. This theme extends to the site's fence materials. The materials and finishes that will be utilized for fences are steel and black paint. Non-decorative walls, corrugated metal, or other types of solid metal and rustic wood fences shall not be used on the site.

Standard 4D: Plywood Fences. *Plywood fences should be allowed only at construction sites and should be removed upon completion of construction. Decorative artwork on the public side of the fence is encouraged.*

The proposed project substantially complies with Standard 4D. Any plywood fencing that may be utilized during construction shall be removed upon completion of construction. The applicant may allow decorative artwork on the public side of any plywood fencing that may be utilized.

***Standard 4E: Barbed Wire.** Security devices, such as razor or barbed wire, are allowed provided they are not visible from any street or public parking area. An alternative to such devices is to incorporate landscape species such as Bougainvillea and Rosa, along the length of the wall and/or as a top accent.*

The proposed project substantially complies with Standard 4E. No razor or barbed wire or similar material shall be used on the project site.

***GUIDELINE 5: LANDSCAPING FREESTANDING WALLS.** Landscape freestanding walls and fences with a variety of plant material, including but not limited to clinging vines, tall growing shrubs, and trees.*

The proposed project substantially complies with Guideline 5. The project's freestanding walls and fences will be landscaped, where appropriate and as shown on the Landscape Plan. Screening shrubs will be planted in front of the wall.

***Standard 5: A Minimum 18-inch Landscape Strip.** Where freestanding walls and fences are adjacent to the public right-of-way, they should be designed with a minimum of an 18-inch landscape strip between the sidewalk and the wall. On the opposite side of the wall, either an 18-inch landscape strip or adequately spaced vine pockets, depending on possible parking space impacts, should be provided for landscape coverage of the wall.*

The proposed project substantially complies with Standard 5. As shown on the Landscape Plan, a five-foot wide landscaped buffer separates the public right-of-way from the project site all along Titus Street. No wall or fencing separates the new parking and warehouse building, or the existing adaptive reuse tower, from the sidewalk. The surface parking lot is separated from the adjoining sidewalk by a landscaped buffer. On Van Nuys Boulevard, the existing and new buildings are built essentially to the property line, with no buffer provided. Five trees will be planted, and four raised planters installed. The open space that separates the new and existing buildings is 11' 9" in width, and extends all the way to the new parking and warehouse building.

***GUIDELINE 6: ACCESSIBILITY.** Provide pedestrian openings for walls and fences along streets and walkways of commercial projects to maintain an open character and retain visibility.*

The proposed project substantially complies with Guideline 6. The new mixed-use building's ground floor commercial frontage is built essentially to the property line, facing Van Nuys Boulevard. Doors provide direct ground floor pedestrian access. The unobtrusive fencing that separates the open space fronting Van Nuys Boulevard includes 3 openings. The gates along Van Nuys Blvd. and two pedestrian gates along Titus will stay opened during the business hours.

***Standard 6A: Continuity of Design.** Freestanding walls on lot lines should allow for pedestrian linkages between adjacent complementary developments and the public right-of-way.*

The proposed project substantially complies with Standard 6A. Freestanding walls or fencing on the project site are kept to a minimum. The minimal use of freestanding walls and fencing, combined with the provision of ground floor pedestrian access along the project's Van Nuys Boulevard frontage, allows for pedestrian linkages between adjacent complementary developments and the public right-of-way.

Standard 6B: Pedestrian Linkages. Pedestrian walkways should be used for pedestrian linkage from one development to another.

The proposed project substantially complies with Standard 6B. The project site's walkway directly connects to Van Nuys Boulevard, providing needed pedestrian access between the project and the businesses and services along the boulevard. In addition, the tenants of both the new and existing residential buildings will be able to access the sidewalks along both Titus Street and Van Nuys Boulevard from ground floor entrances/exits provided at both buildings.

GUIDELINE 7: AUTOMOBILE INGRESS/EGRESS. *Minimize conflicts between pedestrians and automotive traffic by providing separation between automobile driveways and pedestrian paths where a parking lot separates the public right-of-way from the building entrance.*

The proposed project substantially complies with Guideline 7. As shown on the site plan, no parking lot separates either the existing adaptive reuse tower or the new mixed-use building from the public right-of-way frontage along Titus Street and Van Nuys Boulevard.

Standard 7: Ingress and Egress. New projects should provide separate automobile and pedestrian access/egress paths and highlight the automobile entrances with architectural or landscape details that complement the pedestrian entrance.

The proposed project substantially complies with Standard 7. As shown on the site plan, access to the surface parking lot for both automobiles and pedestrians is kept separate. Automobile access is provided by a driveway onto Titus Street. From there, drivers can walk to the retail spaces that front along Van Nuys Boulevard, using the site's pedestrian walkway. Similarly, access to the new parking building is provided by entrances that also front onto Titus Street. Again, drivers parking their cars there can use the pedestrian walkway to access Van Nuys Boulevard. As designed, the project minimizes conflicts between pedestrians and automobiles.

Part Two. Architecture – Building Composition. The Overlay District includes guidelines and standards intended to carry out certain goals and principles related to architecture–building composition. The following discussion demonstrates how the project substantially complies with these guidelines and standards.

GUIDELINE 8. WALL OPENINGS. *Encourage window shopping by providing maximum transparency in the ground floor building facade.*

The proposed project substantially complies with Guideline 8. The new mixed-use building includes three spaces that will be open to the public, two for retail stores and a leasing office for prospective residential tenants. The ground floor façade that faces Van Nuys Boulevard totals 2,325 square feet. Of this amount, 54% percent consists of transparent glazing.

Standard 8: Ground Floor Openings. Wall openings (windows and doors) should occupy at least fifty percent of the linear frontage of the ground floor. Windows and doorways should be recessed at least four (4) inches from the wall face to promote a sense of articulation. Use similar proportions (relationship of height to width) to the proportions and spacing of openings established by adjacent buildings.

The proposed project substantially complies with Standard 8. Wall openings (windows and doors) along the new mixed-use building's Van Nuys Boulevard frontage will occupy 66% percent of the linear frontage of the ground floor. The openings will be recessed 18" inches from the wall face. These proportions were selected because they harmonize with the proportions and spacing of wall openings exhibited in other nearby buildings in Panorama City.

GUIDELINE 9. RHYTHM. *Maintain the existing pattern of upper floor openings established by neighboring structures. Where no neighboring structure with more than one floor exists, the upper story fenestration should enhance not only the pattern and rhythm of the building itself but also that of the adjoining buildings.*

The proposed project substantially complies with Guideline 9. The existing tower was formerly an office building converted into residential units. Consistent with other adaptive reuse projects, the "skin" of this tower, with its distinctive, modern pattern of windows, was preserved. The building due south of the site is a mid-rise non-residential building, without operable windows. Other buildings in the area are also non-residential, with varying patterns of facades and upper floor openings. Constructing a new mixed-use building in an area without existing residential towers and buildings is an urban design challenge. The project has met this challenge by preserving the existing pattern of building frontages along Van Nuys Boulevard. A large number of rectangular windows are provided on each level. In addition, the balconies for all apartments in the new building are partially recessed. This pattern of wall openings provides a cohesive design that will complement the pattern of facades exhibited by other buildings in the area.

Standard 9: Upper Floor Windows. *Each floor above the ground floor should provide for a minimum of two windows. Maintain the predominant difference between upper story openings and ground level openings. Typically, a greater transparent or open area exists at the storefront level designed to display merchandise and promote sidewalk window shopping.*

The proposed project substantially complies with Standard 9. On the east-facing frontage on Van Nuys Boulevard, twelve rectangular windows are arrayed in a varying pattern on each level. Additionally, three partially recessed balconies are provided. While the upper levels also include smooth stucco plus glossy tile, the ground level is predominantly vision and transparent glass.

GUIDELINE 10: BUILDING DESIGN. *Avoid the box-like, bulky appearance of commercial development by articulation of the horizontal or vertical features in a building's design. Use varied materials, textures and/or colors, or provide visual breaks such as arbors, balconies, terraces, recesses, and step back features. Standard franchise or corporate architectural design plans for buildings and signs should be modified where necessary to conform to these guidelines and standards.*

The proposed project substantially complies with Guideline 10. The new building is mixed-use, and thus incorporates design features appropriate for both residential and commercial development. The façade fronting Van Nuys Boulevard has been carefully articulated, and provides numerous visual breaks. The recessed balconies and irregular pattern of rectangular windows provide visual relief. The upper level articulation varies from the ground floor, and its dramatic expanse of glass. The smooth stucco's coordinated palette of colors, plus the playful use of glossy light gray tile, provide the building with a modern aesthetic. All of this blends in nicely with a part of Los Angeles that is rapidly transforming into a regional attraction.

Standard 10A: Consistency with Guidelines and Standards. Standardized architectural building and sign designs, including color palettes that are part of a corporate trademark or identity, should be modified to be consistent with these guidelines. Identify the common horizontal elements (e.g., roofline, storefront height, bulkheads) and vertical elements (piers, doors, windows) found between neighboring structures and develop building designs using a similar pattern.

The proposed project substantially complies with Standard 10A. There is nothing standardized about the design of this unique mixed-use development. The color palettes and sign designs are not part of a corporate trademark or identity, but rather were selected to signal the project's unique architectural brand. The building's design reflects its custom blend of residential and commercial uses, while still allowing it to harmonize with nearby nonresidential buildings.

Standard 10B: Architectural Devices to Create Themes and Rhythms. Establish a thematic link with adjacent buildings by using arbors, trellis elements, foot walls, and landscaping compatible with existing buildings and/or integrated into new building designs.

The proposed project substantially complies with Standard 10B. The project uses various design strategies and techniques to create a master-planned, unified development. When built out, the project will include two mixed-use buildings, and a parking and warehouse building interspersed with extensive common area landscaping, a pool and deck, and connecting pedestrian pathway. All three buildings are designed to complement each other and to seamlessly blend into this emerging mixed-use district. The Landscape Plan enhances these connections, both within the project and to adjacent properties, by highlighting circulation paths and creating zones of activity, rest, and gathering throughout.

***GUIDELINE 11: ROOF LINES** are an important design element in the overall appearance of a commercial district. Any new construction or remodel should specifically take the design of the roof or parapet into consideration in regard to the building itself and adjoining buildings.*

The proposed project substantially complies with Guideline 11. The new mixed-use building has a flat roof line, interspersed with parapets. The adaptive reuse tower also has a flat roof line, but includes a penthouse unit. These roof line will seamlessly integrate into the also flat roof lines of the adjoining buildings in this part of Panorama City. The new parking building, fronting along Titus Street, also has a flat roof line. The warehouse building, however, breaks this monotony through articulated roof lines, an element that adds a focal point to the project.

Standard 11A: Flat Roof treatments. If roofs are flat, then decorative cornice elements and parapets may be sculpted or stepped to extend above the roof line. The height of the parapet or cornice should not be greater than half the height of the first floor as measured from floor level to ceiling beam.

The proposed project substantially complies with Standard 11A. The warehouse building features articulated roof lines. The existing tower includes a penthouse, while the new mixed-use building has three parapets. The height of these parapets is 3'6", far less than half the height of the first floor, which is 20 feet.

Standard 11B: Roof lines. The roof lines of adjacent buildings should be shown in the submitted architectural elevations and photographs to illustrate design considerations and avoid clashes in scale, proportion, and style.

The proposed project substantially complies with Standard 11B. Architectural elevations depict the roof lines of adjacent buildings. This documentation clearly illustrates that design considerations were taken into account in planning this unified development. Clashes in scale, proportion and style have been avoided.

***Standard 11C: Prohibited Roof Designs.** Severe roof pitches that create prominent or out-of-scale building elements, such as A-frame roofs, geodesic domes, or chalet styled buildings should be avoided.*

The proposed project substantially complies with Standard 11C. The roof pitches and designs of the new mixed-use building and existing adaptive reuse tower do not include any out-of-scale building elements. The more varied roof lines intended for the warehouse building are also not out-of-scale, but merely add architectural and urban design interest.

***Standard 11D: Treatment of Roof-mounted Equipment.** The roof should be designed to screen rooftop mechanical equipment. Mechanical equipment should be screened by architectural features such as facade parapets. Wood lattice and plywood screens are strongly discouraged.*

The proposed project substantially complies with Standard 11D. Rooftop mechanical equipment on all three buildings has been screened through the parapet wall. Wood lattice and plywood screens have not been used. Given this screening and the height of these buildings, no roof-mounted equipment is visible to persons on the ground level or on adjacent sidewalks.

***GUIDELINE 12: VISUAL RELIEF TO UNTREATED FACADES.** To avoid the sense of being in a concrete canyon whether in a car or walking, and to create a positive edge to the boulevard streetscape, building facades should incorporate a variety of architectural and design techniques to enhance the business district's appeal to customers.*

The proposed project substantially complies with Guideline 12. This unified development separates the one existing and two new buildings through extensive open space, including landscaped grounds that front along a portion of Van Nuys Boulevard, and a landscaped buffer that adjoins Titus Street. The careful placement of these buildings plus the generous provision of open space means that pedestrians and drivers will not have a “concrete canyon” experience. In addition, the street-facing building facades incorporate a variety of architectural elements that enhance their appeal. The new mixed-use building incorporates vision and transparent glass, decorative light gray glossy tiles, shade trees, raised and in-ground planters, and partially recessed balconies. Other architectural elements include rectangular windows, smooth stucco with a coordinated color palette, and carefully integrated lighting and railing. The new parking and warehouse building include many of these same elements, including vision and translucent glass, smooth stucco, street trees, glossy tiles, an awning, an in-ground planter, and, most importantly, an architecturally distinct warehouse building.

***Standard 12A: Remodeled Façade.** Any significant facade remodel should employ decorative building materials, architectural elements, and hardscape such as tile, brick, stone, marble, light elements (light sconce), wall insets for landscape, planters, or trellises to provide relief to flat, untreated portions of exterior building walls, and facades. The natural color of materials, such as brick, terrazzo, marble, and clay tile, should be used to the maximum extent possible.*

Standard 12A does not apply to the proposed project. No existing façade shall be remodeled.

Standard 12B: New Façade. Any new or remodeled facade project should be accompanied by a fully coordinated paint and finish plan that complements the building's architecture, complies with the spirit and letter of the CDO Plan, and does not conflict with the appearance of adjacent structures.

The proposed project substantially complies with Standard 12B. The new mixed-use and parking buildings will have facades with paint and finish plans that complement their architecture, including vision and translucent glass, smooth stucco with a coordinated color palette, and decorative light gray glossy tiles. Other elements of the paint and finish plans include metal flashing, anodized aluminum, black metal railing, linear LED lighting, and metal doors. This modern design aesthetic harmonizes with the existing tower and adjacent buildings. It fully complies with the spirit of the CDO and its emphasis on complementarity and compatibility.

Standard 12C: Visual relief. The design of any new building walls and facades should provide relief of a minimum depth of 8 inches for at least 5 frontage feet to every 20 feet of the length of the building wall.

The proposed project substantially complies with Standard 12C. The design of the new building provides relief through a staggered grid of tile and window grouping articulated with an 8" projecting steel frame, through vertical stacks of recessed balconies, and 2 recessed slots along the two long facades.

The parking building is defined by a clearly articulated concrete grid of vertical columns and horizontal guard-walls with openings above the guard-walls.

GUIDELINE 13. STOREFRONT LIGHTING. *Building facades should be highlighted through "up" lights or accent lights placed on the facade, or through gooseneck lights mounted on the building facade to highlight facade features and signs. Accent lighting of buildings and landscape to highlight features and elements is encouraged, such as the use of indirect lighting, cove lighting, "wall washing," rim or eaves lighting, and overhead down lighting.*

The proposed project substantially complies with Guideline 13. In addition to having coordinated paint and finish plans, this master-planned unified development also has coordinated lighting plans for the two new buildings. For the new mixed-use building, the lighting plan includes integrated linear LED accent lighting that highlights the staggered grid and up lighting that emphasizes the long linear slots at the long elevation.

For the new parking building and warehouse building, the lighting plan includes linear wash lighting that emphasizes the underside serpentine stair, up-lighting at the columns of the Parking Building. The lighting features incorporated into these two plans complement the lighting features of the existing adaptive reuse tower, which are up-lighting at the top of the building that illuminates the architectural roof frame. In addition, walkways will have path lights and trees will have up lighting.

Standard 13A: Lighting. Direct storefront lighting onto the facade or the sidewalk immediately in front of the store.

The proposed project substantially complies with Standard 13A. The two retail spaces in the new mixed-use building incorporate direct storefront lighting. This lighting, which consists of

Gooseneck sconces with downlighting, illuminates the façade of both retail spaces and also the adjacent sidewalk.

Standard 13B: Control of Glare. Lighting should be shielded to prevent glare on adjacent properties.

The proposed project substantially complies with Standard 13B. Adjacent properties are protected from glare. This unified development accomplishes this objective by appropriately shielding all exterior lighting fixtures on the site to prevent up lighting or other forms of light pollution.

Standard 13C: Window Lighting. Display windows should be accented by using lights placed inside the building.

The proposed project substantially complies with Standard 13C. The two retail spaces and the leasing office in the new mixed-use building are all characterized by large display windows. These display windows will be accented through lights placed in the interior of both retail spaces and the leasing office. The accent lights will consist of dim downlights near the storefront that illuminate the interior.

Standard 13D: Light Fixture Design. All lighting fixtures should be compatible with the architectural design of the building.

The proposed project substantially complies with Standard 13D. All exterior lighting fixtures on both new buildings are compatible with their architectural design. The fixtures are unobtrusive, simple, with metallic and other features that communicate a modern aesthetic. Only 3 different kinds of lighting fixtures have been utilized, to ensure a coherent and balanced lighting program.

GUIDELINE 14: DRIVEWAY AND WALKWAY LIGHTING. *Provide exterior lighting for pedestrian walkway and vehicular access way to provide illumination for safety and security, without excessive light levels or glare.*

The proposed project substantially complies with Guideline 14. The project's lighting program provides exterior lighting for safety and security. Lighting is provided throughout, including the open space, pool, and deck areas; the surface parking lot; the new accessory bathroom building; the pedestrian walkway; and the exterior surfaces of all three main buildings. The number, spacing, and design features of all lighting elements and fixtures ensures there will be no excessive levels of light or glare emanating from this master-planned unified development.

Standard 14: Flood Lighting. Flood lighting and intense lighting which is used solely for theatrical effect or for advertising purposes should be avoided.

The proposed project substantially complies with Standard 14. Flood lighting and intense lighting used for theatrical effect or for advertising is not part of the project's lighting program.

GUIDELINE 15: EQUIPMENT SCREENING. *Screen all mechanical equipment from public view through the use of building parapets, landscaping walls, or other similar architectural treatment.*

The proposed project substantially complies with Guideline 15. Mechanical equipment on the project site is screened from public view by metal screens at the ground level and building

parapets at the roof level. None of this equipment is viewable from the public-right-of-way, nor visible to residents and their guests using the common open space.

***Standard 15A: Mechanical Equipment.** All exterior mechanical equipment, including heating, ventilation and air conditioning (HVAC) equipment, satellite dishes, and cellular antennas, should be screened from public view.*

The proposed project substantially complies with Standard 15A. All exterior mechanical equipment on the project site is screened from public view, so none of it is viewable from the public-right-of-way. It is also not visible to residents and their guests utilizing the common open space. Exterior mechanical equipment is screened using the metal screen at the ground level and building parapets at the roof level.

***Standard 15B: Window and Door Openings.** No mechanical equipment (e.g., air conditioners) should be permitted in any transom, window, or door openings.*

The proposed project substantially complies with Standard 15B. No mechanical equipment (including air conditioners) is used in any transom, window, or door opening on the project site.

***GUIDELINE 16: BUILDING DESIGN TO SCREEN UTILITIES.** Screen and locate utilities, storage areas, loading docks, mechanical equipment and other service areas from public view. This can be accomplished through internal attic mounting, roof setbacks, location in wall or landscape enclosures, or architectural integration with the design of the building.*

The proposed project substantially complies with Guideline 16. This master-planned, unified development takes a comprehensive approach to site design, including the screening and location of all accessory uses and ancillary equipment. The purpose of this design strategy is to ensure a harmonious and aesthetic environment for all residents and their guests. As shown on the site plan, utilities, storage areas, loading docks, mechanical equipment and other service areas are thoroughly screened from public view. Tactics used to accomplish this strategy include roof setbacks, decorative screening and landscape enclosures, and architectural integration.

***Standard 16A: Service Areas.** All service areas should be enclosed or completely screened through the use of a wall enclosure and/or landscape.*

The proposed project substantially complies with Standard 16A. As shown on the submitted plans, all service areas are enclosed and screened through a variety of design tactics, including decorative screening, landscape enclosure, and architectural integration.

***Standard 16B: Wall Enclosures.** Wall enclosures should use decorative surfaces using graffiti-resistant material and screened with adequate landscape, including clinging vines.*

The proposed project substantially complies with Standard 16B. As shown on the submitted plans, all wall enclosures are screened with adequate landscaping. The existing mechanical pad will be screened with metal screen and planted area. Decorative surfaces using graffiti-resistant material are used throughout. Pool equipment will be screened by smooth plaster walls that integrate it with architectural elements of the pool area.

Standard 16C: Parapets. All architectural screening (e.g. parapets) should be designed as an integral part of the building architecture.

The proposed project substantially complies with Standard 16C. All screening devices including parapets, privacy walls and screens, landscape enclosures and similar devices for screening the project's mechanical and other accessory equipment have been integrated into the architecture.

Standard 16D: Exterior Equipment. Exterior wall-mounted or ground-mounted mechanical or electrical equipment should be located to the rear of the site and concealed by an architectural barrier, wall enclosure, or solid landscape barrier.

The proposed project substantially complies with Standard 16D. All mechanical and electrical equipment, whether mounted on the ground or on an exterior wall, has been located to reduce visibility. Architectural barriers, wall enclosures, and landscaping further reduce visibility.

Standard 16E: Underground Utilities. New utility service should be located underground, where determined physically feasible by the Department of Water and Power.

The proposed project substantially complies with Standard 16E. New utility services are located underground, where determined physically feasible by the Department of Water and Power.

GUIDELINE 17: SCREEN COMMUNICATION EQUIPMENT. *In consultation with the Office of Zoning Administration, all cellular antenna cells, wireless communication facilities, and power supply boxes should be screened from public view.*

The proposed project substantially complies with Guideline 17. All cellular antenna cells, wireless communication facilities, and power supply boxes that may be placed on the project site will be screened from public view. The project applicant will consult, as necessary, with the Office of Zoning Administration in complying with Guideline 17. It is anticipated that none of this kind of equipment will be located on the project site.

Standard 17A: Telecommunication Equipment. Freestanding unmanned wireless telecommunications facilities, including radio or television transmitters, should be designed as an architectural tower, a faux pine tree or other similar type of structure which best blends in with the environment in which it is placed.

The proposed project substantially complies with Standard 17A. Freestanding unmanned wireless telecommunications facilities, including radio or television transmitters, that may be placed on the project site will be designed as an architectural tower, a faux pine tree or other similar type of structure which best blends in with the environment in which it is placed. At this time, it is anticipated that none of this kind of equipment will be located on the project site.

Standard 17B: Building Design to Screen Equipment. Building and roof mounted antennas and other telecommunication equipment should be painted and textured to visually integrate with the architecture of the existing structures to which they are attached, or they should be effectively screened by the use of parapets or similar architectural elements.

The proposed project substantially complies with Standard 17B. Building and roof mounted antennas and other telecommunication equipment will be painted and textured in accordance with

a coherent design strategy. All project antennas and related equipment on the site will be visually integrated or screened using various architectural treatments, including parapets and metal screens.

GUIDELINE 18: EXTERIOR SURFACE MATERIALS. *New infill buildings should be constructed to integrate and harmonize with adjacent buildings. New infill construction should be sensitive to the adjacent building design and use exterior surface materials that complement existing buildings. Exterior surface materials in Panorama City should be brick, smooth stucco (float or trowel finish), and stone. Wood siding that conveys a western motif, metal siding to convey an industrial theme, or plaster and wood for an English Tudor theme, are out of place in Panorama City.*

The proposed project substantially complies with Guideline 18. The new mixed-use and parking buildings, both of which constitute infill construction, will harmonize with the surrounding built environment of nonresidential construction. The area is not characterized by historic structures, and so a modern aesthetic has been used as a guiding principle. The range of exterior surface materials used in both buildings, from smooth stucco and glossy tiles, to metal flashing and railing, is consistent with this principle. The project eschews a hokey aesthetic, such as western, industrial, English Tudor or similar themes, that would be out of place in Panorama City.

Standard 18A: Exterior Surface Materials. *The use of wood, metal, and heavily textured stucco (combed finish, dash troweled finish, stipple-troweled finish) as primary exterior building materials should not be used.*

The proposed project substantially complies with Standard 18A. The primary exterior building material is smooth stucco – and none will be heavily textured. Metal, for flashing, railing, and sliding and metal doors, has been used sparingly, while wood has not been used at all.

Standard 18B: Accessory Materials. *Wood and metal may be used for door frames, window frames, and other accessory uses.*

The proposed project substantially complies with Standard 18B. The proposed project has clear anodized aluminum windows, doors, and storefronts that complement the existing tower. Anodized metal frames around façade groupings provides articulated detail.

GUIDELINE 19: COMPLEMENTARY BUILDING MATERIALS. *Use complementary building materials to those of surrounding structures.*

The proposed project substantially complies with Guideline 19. The new mixed-use and parking buildings will integrate and harmonize with adjacent buildings, which are primarily nonresidential. A modern aesthetic has been used as a guiding principle, so the project's use of smooth stucco, glossy tile, expanses of glass, and metal complements the building materials used in the existing adaptive reuse tower and other nearby structures in this part of Panorama City.

Standard 19A: Recommended building materials. *Bouquet Canyon Stone; common red or earth tone bricks and stone; lightly textured painted stucco; wood accents and wood trim for windows and doors; marble; tile; and terrazzo are recommended building materials.*

The proposed project substantially complies with the spirit and intent of Standard 19A. This unified development has been master-planned, using a comprehensive design strategy, guided by a design aesthetic that reflects the area's Regional Commercial designation and the predominance of nonresidential buildings. Consequently, although recommended, the following materials have not been used: Bouquet Canyon Stone; common red or earth tone bricks and stone; lightly textured painted stucco; wood accents and wood trim for windows and doors; marble; and terrazzo building materials. However, glossy tile has been used. The project is not cookie-cutter. Instead, it has sought to achieve the Overlay District's overarching design principles, which include "individuality through distinctive storefront design," "compatibility through overall thematic coordination," and "simplicity through reduction of clutter."

***Standard 19B: Inappropriate building materials.** Exterior surfaces should avoid materials not commonly used in adjacent buildings, such as metal (e.g., corrugated, exposed sheet metal); plastic or fiberglass; plywood or imitation wood siding; reflective, mirrored or opaque glass; imitation stone or masonry (natural veneers are acceptable); unfinished concrete and concrete block; bare aluminum (anodized is preferred); heavily textured plaster or stucco (combed finish, dash trowel finish, stipple-troweled finish); wood shakes or shingles. (Please note: some of these materials when used in moderation or as accents may be considered appropriate.)*

The proposed project substantially complies with Standard 19B. The following exterior surfaces have been avoided: corrugated, exposed sheet metal; plastic or fiberglass; plywood or imitation wood siding; reflective, mirrored or opaque glass; imitation stone or masonry; unfinished concrete and concrete block; bare aluminum; heavily textured plaster or stucco (combed finish, dash trowel finish, stipple-troweled finish); and wood shakes or shingles.

GUIDELINE 20: SIGNAGE PLAN. Signs within a project should be part of a coherent design concept with regard to height, size, shape, location, and colors, and should be compatible with the architecture of the building(s).

***Standard 20A: Signage Plan.** Projects, whether involving sites with multiple tenants or in some cases a single tenant with multiple signs, should submit a sign program with text and detailed elevations illustrating the number, location, size, fonts, colors and construction of proposed signs.*

The signage proposed project substantially complies with Standard 20A. The site consists of the existing Live-Work, Mixed-Use, residential units which was created using the City of LA Adaptive Reuse Program. The ground floor of the tower includes previously permitted commercial and retail spaces and is currently vacant. The layout of this space is being reconfigured for one "Food-Hall" with 16 "KITCHENS". Each kitchen will serve a different type of food operated by one vendor independently; as such, requiring 16 different commercial wall signs (one for each tenant). These 16 commercial signs are being designed to be installed on three building-faces (7 on the north-face, 6 on the south face, and 3 on the east face) of the ground floor of the existing tower. The newly proposed 200-unit mixed-use building will include two retail spaces with approximately 2,450 square feet of retail spaces in total, and will have one commercial wall sign for each tenant.

In addition, a warehouse structure (single tenant) will be constructed adjacent to the Parking Building along Titus Street, and propose one commercial sign for the Warehouse.

Various tenants will be occupying various non-residential spaces on the site and will need sign to identify their businesses to the general public and patrons of this unified development. The

comprehensive Signage Program - included as a part of this entitlement package - has been design by the project architect as a part of the original architectural design-style of this development; and as such, fully complies with the sign requirements and regulation of this Panorama City Community Plan.

Finally the residential and auxiliary signs are for identifications and directional purposes and are necessary for providing safety and convenience of the residents and patrons of the development.

Standard 20B: Size Limits For Signs. Wall-mounted signage should not exceed 2 square feet of area per 1 linear foot of frontage of the site. The size and shape of a sign should be proportionate to the scale of the building and to the scale of adjacent signs. The sign area may thus be further reduced to maintain proportionality, but will not be restricted to less than 1 square foot per linear foot of frontage.

The proposed Signage Program for the project substantially complies with Standard 20B. The site has 300 feet frontage along Van Nuys Blvd., and 600 feet frontage along Titus Street – allowing for substantial signage square footage (up to 1,800 +/- sq.ft.). The signage program for the site has been elegantly designed by the architect as a part of the architectural design of the building and in harmony with the overall character of the site, the existing mixed-use tower, and the community around the site.

As shown on Sheet SG in **Appendix A**, the Project is proposing various commercial, residential, commercial-identification, and auxiliary signs. A total of 34 signs are designed for the proposed and existing buildings.

The existing mixed-use tower will be accommodating several commercial tenants for the proposed Food-Hall and/or commercial spaces on its ground floor.

Please refer to sheets SG 1.0 thru SG 2.7 in **Appendix A** for the design-details of all these signs and their sizes - which are all in compliance with the CDO. As it is clearly shown on the signage plans, the sizes of signs are all well below the allowable sign-square-footages in the Panorama City Community Plan/ CDO guidelines.

Standard 20C: Number of Wall Signs. Each commercial tenant should be limited to one sign per building facade of the leasehold facing a street or parking lot. The sign may include a logo, as well as text, but should not repeat any element on a given facade. Sign text should be limited to business identification only.

The signage proposed for the project substantially complies with Standard 20C.

The proposed mixed-use, 200-unit, building will accommodate two commercial tenants on its ground floor, and we are requesting two commercial wall signs facing Van Nuys Blvd (one sign for each commercial tenant).

The “Food Hall/Retail” facility on the ground floor of the existing mixed-use tower is expected to have 16 commercial tenants (KITCHEN); as such, we are requesting 16 commercial wall signs (one for each commercial tenant).

The blade sign at the corner of Titus and Van Nuys Blvd. will simply identify the Food-Hall establishment with no specific tenant name. A second identification sign for the Food-Hall is also requested and will be mounted on the west-facing wall of the tower.

Again, the matrix for all these signs are in full compliance with the formula in Section 7. (SIGNS) of the Panorama City CDO.

Standard 20D: Sign Type Preference. Channel letters (individual letters mounted separately on the channel or directly against the wall) should be used. Cabinet signs should be restricted to logos, custom shaped cabinet signs, and serial cabinet signs that are part of an architectural plan for a commercial site. Signs that feature blinking, flashing, or running lights, movement of the whole sign or any part thereof, or changing messages should be avoided.

The signage proposed for the project substantially complies with Standard 20D. All of the signs for the site will consist of Channel signs, mounted separately, and will comply with the requirements of Standard 20D - as each commercial tenant is selected. Signs will not include any blinking, flashing, or running lights, etc. At this phase of the development, the Project does not have our tenants on-board, as such the specifics of the sign for each tenant is not available, but it will be presented as we go forward to obtain "Sign Permit" for each commercial-sign.

Standard 20E: Auxiliary Signs. Auxiliary signs up to a maximum of 16 square feet, such as directional signs, may be permitted, and may include a small logo if needed for informational purposes. Approval of such signs will be based on whether each sign, on a case by case basis, serves the public health or safety.

a) The Project is requesting three (8"x6") auxiliary signs on the east-facing of the proposed 200-unit mixed-use building with a total area of 1 square feet, and, one auxiliary sign with 0.3 square feet area on north-facing wall of this proposed building.

b) The Project is requesting five auxiliary signs with a total area of 1.5 square feet on the west-facing wall of the existing tower.

Standard 20F: Temporary Signs. Temporary signs, up to 100 square feet, such as banners, may be permitted for up to 30 days for certain occasions, such as a store opening.

No temporary sign is being proposed.

Standard 20G: Portable Signage. One portable menu board sign may be permitted in the right-of-way for eating establishments, bakeries, florists, and similar businesses that have as their primary sales perishable goods, provided that all of the following conditions are met:

The sign is removed at the end of each business day.

The sign's dimensions do not exceed two feet by three feet.

The sign does not interfere with pedestrian movement or wheelchair access.

The sign has a weighted base capable of keeping the sign upright in moderate wind.

The sign is not illuminated.

The sign's permits have been secured from the appropriate City of Los Angeles departments.

No portable sign is being proposed.

Standard 20H: Awning Signs. *Awning signage should be limited to a maximum of 5 square feet of text or a similar sized logo on the sides if the canopy design is not curved. If the canopy is curved, then only one sign is permitted on the canopy. The street address of the project should be clearly printed or mounted on the front of the canopy. Excluding the address, any sign square footage on the canopy should be subtracted from the maximum area permitted for wall signage.*

No awning sign is being proposed.

Standard 20I: Pedestrian Signs. *One pedestrian sign may be permitted underneath an awning, perpendicular to the face of the building not to extend beyond the lowest part of the awning. The area of such signage should be subtracted from the maximum area permitted for wall signage.*

No pedestrian sign is requested.

Standard 20J: Directory Signs on Private Property. *Directory signs or kiosks may be considered for private arcades and should be on private property, located in courtyards, access ways, or passages. Approval will be subject to considerations of size, location, design and content (absence of advertising copy).*

No Directory Sign on Private Property is requested.

Standard 20K: Directory Signs in the Public Right-of-Way. *Directory signs or kiosks may be considered in the public right-of-way, subject to review and approval by the Planning Department, Public Works, and the Cultural Affairs Department.*

No Directory Sign in the Public Right-of-Way is requested.

Standard 20L: Non-Conforming Rights. *As with all other non-conforming aspects subject to the CDO, legal non-conforming signs may be continued, repaired, or replaced in kind so long as the originating business continues on-site. Any subsequent business should conform to the standards of the CDO.*

There are no Non-Conforming Rights for the property identified.

Standard 20M: Prohibited Signs and locations. *New or replacement billboards of any size, illuminated architectural canopy or awning signs, painted signs or advertising on windows, should be prohibited. Signs located on the roof, or mounted on a wall such that any portion of the sign breaks the roof line, are prohibited.*

Not applicable.

Standard 20N: Sign Accommodation of Streetscape Impacts. *As street trees are planted, and go through various stages of growth, they will tend to obscure wall signs. In order to minimize this impact, conforming signs may be moved, modified, or replaced, to adjust for tree interference with vision lines, without initiating sign fees.*

Noted.

GUIDELINE 21: ENTRY ORIENTATION. *Orient storefront entrances toward the public right of way to facilitate pedestrian movement between stores and the boulevard.*

The proposed project substantially complies with Guideline 21. The entrance to each ground-floor store in the new mixed-use building opens onto Van Nuys Boulevard.

Standard 21: Entry Orientation. A main building entrance should face the public right-of-way. The proposed project substantially complies with Standard 21. The entrance to each retail store in the new mixed-use building, as well as its leasing office, opens onto Van Nuys Boulevard. In addition, the two vehicular entrances to the new parking building face Titus Street

GUIDELINE 22: ENTRY EMPHASIS. *Design storefront entryways to become the prominent feature in the frontage facade and simultaneously create an inviting entrance to the store.*

The proposed project substantially complies with Guideline 22. The entryways to each of the two retail stores in the new mixed-use building are the prominent feature in the frontage façade. They are prominent because they are double doors placed in the center, and bracketed by raised and tiled planters. These features, plus the expansive use of vision glass, make them both inviting.

Standard 22A: Entry Recesses. Storefront entries should be recessed from the front lot line a minimum of two feet.

The proposed project substantially complies with Standard 22A. The entryways to each of the two retail stores are recessed from the front lot line by 2 feet.

Standard 22B: Entry Illumination. Storefront entries should be illuminated.

The proposed project substantially complies with Standard 22B. The entryways to each of the two retail stores are illuminated properly based on our lighting plans which will be designed as part of Electrical-Lighting system for the building prior to submitting plans to LADBS for plan check.

Standard 22C: Architectural Treatment. Entryways should be enhanced through architectural treatments such as tiling on the floor around the doorway, individual awnings, or placement of signs above the entryway.

The proposed project substantially complies with Standard 22C. A white linear LED lighted sign will be placed over the entryway to each of the two retail stores. The entryways are further enhanced through the dramatic use of vision glass, that will rise to 20 feet across the façade.

GUIDELINE 23: DOORS TRANSPARENCY. *Doors should contribute to the overall transparency of the storefront.*

The proposed project substantially complies with Guideline 23. The double doors that mark the entryway to each of the two retail stores will be transparent.

Standard 23: Door Transparency. Doors for retail shops should contain 70 percent clear glass with 90 percent light transmission.

The proposed project substantially complies with Standard 23. The double doors that mark the entryway to each of the two retail stores will contain a minimum of 70 percent clear glass with a minimum of 90 percent light transmission.

GUIDELINE 24: FACADE TRANSPARENCY. *In order to provide flexibility while maintaining the overall transparency of the storefront through the use of transparent doors and windows, some options will be considered. Café-style curtains which block views at lower levels while still maintaining some views and light into the interior and art works are two options that may receive approval upon review.*

The proposed project substantially complies with Guideline 24. Transparency will not be compromised through the use of techniques, such as curtains or other devices, that block views into the interiors of the two retail stores.

Standard 24A: Minimum Transparency. *A minimum of 40 percent of the ground floor façade should be transparent glass.*

The proposed project substantially complies with Standard 24A. The ground floor façade of the new mixed-use building is 54% of the ground floor façade area is transparent glass, well above 40 percent.

Standard 24B: Windows. *Windows should not be covered over with any type of material including but not limited to lattices, paper, and plywood. They may be painted with art works so long as these do not include advertising copy.*

The proposed project substantially complies with Standard 24B. Storefront windows will remain transparent, and not covered over with material such as lattices, paper, or plywood.

Standard 24C: Prohibited Dark Tinted Glass. *Reflective or very dark tinted glass should not be used at the ground floor and mirror/reflective glass or films should not be used in any location.*

The proposed project substantially complies with Standard 24C. Reflective or very dark tinted glass will not be used at the ground floor of the new mixed-use building's two retail stores. Mirror/reflective glass or films will not be used anywhere on the project site.

GUIDELINE 25: CONCEALMENT OF SECURITY FIXTURES. *Ensure that security devices are not visible during store hours of operation or use alternatives, such as interior electronic security, fire alarm systems or vandal-proof glazing. Security bars, grates, gates, and similar devices are preferred to roll shutters and grills. They allow after hour window shopping and night security light spillage onto the sidewalk.*

The proposed project substantially complies with Guideline 25. Security devices will not be visible during store hours of operation. After hours, roll shutters and grills will not be used. After hours security will be maintained through the morning hours for the entire site. In general, the entire site is a "secured site" after operating hours for the retail establishments, but maintain open during the retail/food establishment operating hours

Standard 25A: Exterior Security Fixtures. *Exterior security bars, gates, grates, grilles, and similar devices should be avoided.*

The proposed project substantially complies with Standard 25A. Exterior security bars, gates, grates, grilles, and similar devices will not be used.

Standard 25B: Concealment of Security Fixtures. Interior security bars, gates, grates, grilles, and similar devices should recess into pockets or receptacles to provide complete concealment when they are retracted.

The proposed project substantially complies with Standard 25B. Interior security bars, gates, grates, grilles, and similar devices, if used on the project site, will recess into pockets or receptacles to provide complete concealment when they are retracted.

GUIDELINE 26: WINDOW TRANSPARENCY. *Transparent windows provide for light into storefronts. Windows naturally attract shoppers and showcase merchandise and other goods. Storefront windows should maintain their transparency through the choice of glass material and careful placement of window signs.*

The proposed project substantially complies with Guideline 26. The ground floor façade of the new mixed-use building is composed primarily of transparent glazing. The use of vision glass for the doors and windows maintains transparency. Window signs will be placed to maintain transparency, and otherwise conform to the project's Sign Program, pursuant to Guideline 20.

Standard 26A: Transparency. Windows should be clear, with at least 90 percent light transmission.

The proposed project substantially complies with Standard 26A. Windows will be clear, with at least 90 percent light transmission.

Standard 26B: Window Sign Size. Window signs should be limited to permanent signs that occupy no more than 15 percent of the windows.

The proposed project substantially complies with Standard 26B. Window signs will be limited to permanent signs that occupy no more than 15 percent of the windows, and otherwise conform to the project's Sign Program, pursuant to Guideline 20.

Standard 26C: Window Sign Content. Content in window signs should be limited to the name of the business, hours of operation, product sold, or logo image.

The proposed project substantially complies with Standard 26C. No off-site signage will be displayed. Content in window signs will be limited to the name of the business, hours of operation, product sold, or logo image, and otherwise conform to the project's Sign Program, pursuant to Guideline 20.

ZI-2452 Transit Priority Area in the City of Los Angeles

On September 2013, the Governor signed into law Senate Bill (SB) 743, which instituted changes to the California Environmental Quality Act (CEQA) when evaluating environmental impacts to projects located in areas served by transit. While the thrust of SB 743 addressed a major overhaul on how transportation impacts are evaluated under CEQA, it also limited the extent to which aesthetics and parking are defined as impacts under CEQA. Specifically, Section 21099 (d)(1) of

the Public Resources Code (PRC) states that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if:

1. The project is a residential, mixed-use residential, or employment center project, and
2. The project is located on an infill site within a transit priority area.¹²⁶

The Project contains multiple uses, including residential and commercial. The Project Site is an infill site, which is defined in pertinent part as a lot located within an urban area that has been previously developed.¹²⁷ The Project Site is within a transit priority area, which is defined in pertinent part as an area within one-half mile of an existing major transit stop.¹²⁸

ZI-2374 Los Angeles State Enterprise Zone

The Site is within an Enterprise Zone/Employment and Economic Incentive Program Area (EZ). The Federal, State and City governments provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services. EZ special provisions applicable to plan check include parking standards and height.¹²⁹ The Los Angeles State Enterprise Zone provides reduced parking requirements of 2 spaces for every 1,000 square feet of business, retail, restaurant, bar and related uses (LAMC Section 12.21.A.4(x)(3)6.) Commercial uses include retail, and child day care center. These uses will utilize the Enterprise Zone's reduced parking requirement of 2 spaces for every 1000 square feet.

Conclusion

The requested discretionary actions do not conflict with existing land uses in the area, and the Project would not introduce incompatible uses. The Project is consistent with SCAG guides and other regional guides, the General Plan, the Community Plan, and the CDO.

Moreover, the criterion for determining significance with respect to a land use plan emphasizes conflicts with plans adopted for the purpose of avoiding or mitigating an environmental effect, recognizing that an inconsistency with a plan, policy or regulation does not necessarily equate to a significant physical impact on the environment.

The analysis of potential land use impacts of the Project, therefore, considers consistency with adopted plans, regulations, and development guidelines that regulate land use on the Project Site, based on detailed review of the relevant documents.

The Project would not conflict with the whole of applicable goals, objectives, and policies in local and regional plans that were adopted to mitigate or avoid and environmental effect. Therefore, the Project would not be in substantial conflict with relevant environmental policies in applicable plans. Therefore, impacts would be less than significant.

Cumulative Impacts

¹²⁶ <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>.

¹²⁷ California Public Resources Code Section 21099(a)(4).

¹²⁸ California Public Resources Code Section 21099(a)(7).

¹²⁹ ZI-2374: <http://zimas.lacity.org/documents/zoneinfo/ZI2374.pdf>.

Less Than Significant Impact.

With respect to community division, none of the related projects or other development in the Community Plan Area would divide an existing community. However, as the Project would have no impact with respect to community division and habitat conservation plans, it would not contribute to a cumulative impact.

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

XII. MINERAL RESOURCES

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

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact.

Mineral Resources Zone-2 (MRZ-2) sites contain potentially significant sand and gravel deposits, which are to be conserved. Any proposed development plan must consider access to the deposits for purposes of extraction. Much of the area within the MRZ-2 zone in Los Angeles was developed with structures prior to the MRZ-2 classification and, therefore, are unavailable for extraction.¹³⁰ MRZ-2 sites are identified in two community plan elements of the city's general plan, the Sun Valley and the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon community plans.¹³¹

Neither the Project Site nor the surrounding area is in an MRZ-2 zone, nor identified as an area containing mineral deposits of regional or statewide significance. Therefore, no impact to known mineral deposits would occur.

The Project Site is not located within any Major Oil Drilling Areas, which are 25 city designated major oil drilling areas.¹³² The California Geologic Energy Management Division (CalGEM) online mapping of wells shows there is no oil and gas well on the Site.¹³³ Therefore, no impact would occur.

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

¹³⁰ City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-58: https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf, accessed August 23, 2022.

¹³¹ City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-59: https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf, accessed August 23, 2022.

¹³² City of Los Angeles Department of City Planning, Safety Element Exhibit E, Oil Field and Oil Drilling Areas: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed August 23, 2022.

¹³³ California Department of Conservation, Division of Oil, Gas & Geothermal Resources (DOGGR), Online Mapping System, District 1, <https://maps.conservation.ca.gov/doggr/wellfinder/#close/>, accessed August 23, 2022.

No Impact.

A significant impact would occur if a project is located in an area used or available for extraction of a locally-important mineral resource and the Project converted an existing or potential future locally-important mineral extraction use to another use or if the Project affected access to a site in use or potentially available for locally-important mineral resource extraction. The Project Site is not delineated as a locally important mineral resource recovery site on any City plans. Additionally, as stated in the response to Question 12(a), no oil wells exist on the Project Site. Furthermore, the Project Site is surrounded by dense urban uses. Thus, the Project Site would not be an adequate candidate for mineral extraction. Therefore, no impact would occur.

Cumulative Impacts**Less Than Significant Impact.**

As the Project would have no impact on mineral resources, it would not contribute to a cumulative impact. Therefore, there would be no cumulative impact on mineral resources.

XIII. NOISE

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
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?	☐	☐	☒	☐
b.	Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
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?	☐	☐	☐	☒

This section is based on information and analysis provided in the following technical modeling, included in **Appendix H** of this SCEA.

H Noise Technical Modeling, NTEC, July 2020.

Fundamentals of Sound and Environmental Noise

Sound can be described in terms of its loudness (amplitude) and frequency (pitch). The standard unit of measurement for sound is the decibel, abbreviated dB. Because the human ear is not equally sensitive to sound at all frequencies, the A-weighted scale (dBA) is used to reflect the normal hearing sensitivity range of the human ear. **Table 5.13-1** provides examples of A-weighted noise levels from common sources. Although the terms “sound” and “noise” are often used synonymously, noise is commonly defined as sound that is either loud, unpleasant, unexpected, or undesired.¹³⁴ Because decibels are logarithmic units, they cannot be simply added or subtracted. For example, two cars each producing 60 dBA of noise would not produce a combined 120 dBA.

**Table 5.13-1
A-Weighted Decibel Scale**

Common Noise Sources	Sound Level, dBA
Near Jet Engine	130
Rock and Roll Band	110
Jet Flyover at 1,000 feet	100
Power Motor	90
Food Blender	80
Living Room Music	70
Human Voice at 3 feet	60

¹³⁴ California Department of Transportation (Caltrans), Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

Residential Air Conditioner at 50 feet	50
Bird Calls	40
Quiet Living Room	30
Average Whisper	20
Rustling Leaves	10
These noise levels are approximations intended for general reference and informational use. They do not meet the standard required for detailed noise analysis but are provided for the reader to gain a rudimentary concept of various noise levels.	
Source: Cowan, James P., Handbook of Environmental Acoustics, 1993	

Noise Definitions

This noise analysis discusses sound levels in terms of equivalent noise level (L_{eq}), maximum noise level (L_{max}), minimum noise level (L_{min}), and Community Noise Equivalent Level (CNEL). Statistical descriptors (L_x) are also discussed.

Equivalent Noise Level (L_{eq}). L_{eq} represents the equivalent steady-state noise level for a stated period of time that would contain the same acoustic energy as the fluctuating, time-varying noise level of that same period. For example, the L_{eq} for one hour is the energy average noise level for that hour. L_{eq} can be thought of as a continuous noise level for a certain period that is equivalent in acoustic energy content to a fluctuating noise level of that same period. In this report L_{eq} is expressed in units of dBA.

Maximum Noise Level (L_{max}). L_{max} represents the highest instantaneous noise level of a specified time period.

Minimum Noise Level (L_{min}). L_{min} represents the lowest instantaneous noise level of a specified time period.

Community Noise Equivalent Level (CNEL). CNEL is a weighted noise measurement scale of average sound level during a 24-hour period. Due to increased noise sensitivities during evening and night hours, human reaction to sound between 7:00 P.M. and 10:00 P.M. is as if it were actually 5 dBA higher than had it occurred between 7:00 A.M. and 7:00 P.M. From 10:00 P.M. to 7:00 A.M., humans perceive sound as if it were 10 dBA higher. To account for these sensitivities, CNEL penalizes evening noise levels between 7:00 P.M. and 10:00 P.M. by an additional 5 dBA and nighttime noise levels between 10:00 P.M. and 7:00 A.M. by an additional 10 dBA. Because of this, 24-hour CNEL figures are always higher than their corresponding 24-hour L_{eq} .

Statistical Descriptor (L_x). L_x is used to represent the noise level exceeded X% of a specified time period. For example, L_{90} represents the noise level that is exceeded 90% of a specified time period. L_{90} is commonly used to represent ambient or background steady-state noise levels.¹³⁵

Effects of Environmental Noise

The degree to which noise can impact an environment ranges from levels that interfere with

¹³⁵ Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

speech and sleep to levels that can cause adverse health effects. Most human response to noise is subjective. Factors that influence individual responses may include the intensity, frequency, and pattern of noise; the amount of background or existing noise present; and the nature of work or human activity that is exposed to intruding noise.

According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of 75 dBA or less, even after continuous and repeated exposure, are unlikely to cause hearing loss.¹³⁶ The World Health Organization (WHO) reports that adults should not be exposed to sudden “impulse” noise events of 140 dB or greater. For children, this limit is 120 dB.¹³⁷

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping environments, the WHO recommends that continuous interior noise levels should not exceed 30 dBA L_{eq} and that individual noise events of 45 dBA or higher be limited.¹³⁸

Some epidemiological studies have shown a weak association between long-term exposure to noise levels of 65 to 70 dBA L_{eq} or greater and cardiovascular effects, including ischaemic heart disease and hypertension. However, at this time, the relationship is largely inconclusive.

It is generally accepted that people with normal hearing sensitivity can barely perceive a 3 dBA change in noise levels, though if changes occur to the character of a sound (i.e., changes to the frequency content), then changes less than 3 dBA may be more noticeable.¹³⁹ Changes of 5 dBA may be readily perceptible, and changes of 10 dBA are perceived as a doubling in loudness.¹⁴⁰ However, few people are highly annoyed by daytime noise levels below 55 dBA.¹⁴¹

Noise Attenuation

Generally speaking, noise levels decrease, or “attenuate,” as distances from noise sources to receivers increases. For each doubling of distance, noise from stationary or small, localized sources, commonly referred to as “point sources,” may attenuate at the rate of 6 dBA for each doubling of distance. This attenuation is referred to as the inverse square law. For example, if a point source emits a noise level of 80 dBA at a reference distance of 50 feet its noise level would be approximately 74 dBA at a distance of 100 feet, 68 dBA at a distance of 200 feet, etc. Noise emitted by “line” sources such as highways attenuates at the rate of 3 dBA for each doubling of distance.¹⁴²

Factors such as ground absorption and atmospheric effects may also affect the propagation of noise. In particular, ground attenuation by non-reflective surfaces such as soft dirt or grass may contribute to increased attenuation rates of up to an additional 8-10 dBA per doubling of

¹³⁶ National Institute of Health, National Institute on Deafness and Other Communication. www.nidcd.nih.gov/health/noise-induced-hearing-loss.

¹³⁷ World Health Organization, Guidelines for Community Noise, 1999.

¹³⁸ World Health Organization, Guidelines for Community Noise, 1999.

¹³⁹ Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

¹⁴⁰ Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

¹⁴¹ World Health Organization, Guidelines for Community Noise, 1999.

¹⁴² Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

distance.¹⁴³

Noise is most audible when traveling by direct line of sight, an unobstructed visual path between a noise source and a receiver. Barriers that break the line of sight between noise sources and receivers, such as walls and buildings, can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. Barriers can reduce source noise levels by up to 20 dBA, though it is generally infeasible for temporary barriers to reduce source noise levels by more than 15 dBA.¹⁴⁴ In cases where the noise path from source to receiver is direct but grazes the top of a barrier, noise attenuation of up to 5 dBA may still occur.¹⁴⁵

Fundamentals of Vibration

Vibration is an oscillatory motion that can be described in terms of displacement, velocity, and acceleration.¹⁴⁶ Unlike noise, vibration is not a common environmental issue, as it is unusual for vibration from vehicle sources to be perceptible. Common sources of vibration may include trains, construction activities, and certain industrial operations.

Vibration Definitions

This analysis discusses vibration in terms of Peak Particle Velocity (PPV).

Peak Particle Velocity (PPV). PPV is commonly used to describe and quantify vibration impacts to buildings and other structures. PPV levels represent the maximum instantaneous peak of a vibration signal and are generally measured in inches per second (in/sec).¹⁴⁷

Effects of Vibration

High levels of vibration may cause damage to buildings or even physical personal injury. However, vibration levels rarely affect human health outside the personal operation of certain construction equipment or industrial tools. Instead, most people consider environmental vibration to be an annoyance that may affect concentration or disturb sleep. Background vibration in residential areas is usually not perceptible, and perceptible indoor vibrations are generally caused by sources within buildings themselves, such as slamming doors or heavy footsteps. Vibration from traffic on smooth roadways is rarely perceptible, even from larger vehicles such as buses or trucks.¹⁴⁸ The threshold of human perception of vibration is approximately 0.01-0.02 in/sec PPV.¹⁴⁹

Regulatory Framework

Federal

Currently, no federal noise standards regulate environmental noise associated with temporary construction activities or the long-term operations of development projects. As such, both temporary and long-term noise impacts resultant from the Project would be largely regulated or

¹⁴³ Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

¹⁴⁴ Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

¹⁴⁵ Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

¹⁴⁶ Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.

¹⁴⁷ Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.

¹⁴⁸ Caltrans, Transportation and Construction Vibration Guidance Manual, September 2013.

¹⁴⁹ Caltrans, Transportation and Construction Vibration Guidance Manual, September 2013.

otherwise evaluated by State and City of Los Angeles standards designed to protect public well-being and health.

State

2017 General Plan Guidelines

The State of California's 2017 General Plan Guidelines propose county and city standards for acceptable exterior noise levels based on land use. These standards are incorporated into land use planning processes to prevent or reduce noise and land use incompatibilities. The State's suggested compatibility considerations between various land uses and exterior noise levels are not regulatory in nature, but recommendations intended to aid communities in determining their noise-acceptability standards.

City of Los Angeles

General Plan Noise Element

The City of Los Angeles General Plan contains a Noise Element that includes objectives and policies intended to guide the control of noise to protect residents, workers, and visitors. Its primary goal is to manage long-term noise impacts to preserve acceptable noise environments for all types of land uses. The Noise Element contains no quantitative or other thresholds of significance for evaluating a project's noise or vibration impacts. However, the Noise Element does contain a land use and noise compatibility table, which is shown in **Table 5.13-2** below. Policy P16 of the Noise Element instructs to use, "as appropriate," this table "or other measures that are acceptable to the city, to guide land use and zoning reclassification, subdivision, conditional use and use variance determinations and environmental assessment considerations, especially relative to sensitive uses, as defined by this chapter..."¹⁵⁰ "Noise sensitive" uses are defined as "single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodgings and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves, and parks."¹⁵¹ The Noise Element further instructs that the table is designed "to help guide determination of appropriate land use and mitigation measures vis-à-vis existing or anticipated ambient noise levels."

Table 5.13-2

City of Los Angeles Noise Element – Guidelines for Noise Compatible Land Use

Land Use Category	Day-Night Average Exterior Sound Level (CNEL dB)						
	50	55	60	65	70	75	80
Residential Single Family, Duplex, Mobile Home	A	C	C	C	N	U	U
Residential Multi-Family	A	A	C	C	N	U	U
Transient Lodging, Motel, Hotel	A	A	C	C	N	U	U
School, Library, Church, Hospital, Nursing Home	A	A	C	C	N	N	U
Auditoriums, Concert Halls, Amphitheaters	C	C	C	C/N	U	U	U
Sports Arena, Outdoor Spectator Sports	C	C	C	C	C/U	U	U

¹⁵⁰ Noise Element of the Los Angeles City General Plan, February 1999.

¹⁵¹ Noise Element of the Los Angeles City General Plan, February 1999.

Playground, Neighborhood Park	A	A	A	A/N	N	N/U	U
Golf Course, Riding Stable, Water Recreation, Cemetery	A	A	A	A	N	A/N	U
Office Building, Business, Commercial, Professional	A	A	A	A/C	C	C/N	N
Industrial, Manufacturing, Utilities, Agriculture	A	A	A	A	A/C	C/N	N
A = Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements. C = Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditioning will normally suffice. N = Normally Unacceptable - New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design. U = Clearly Unacceptable - New construction or development should generally not be undertaken. Source: Noise Element of the Los Angeles City General Plan – Exhibit I							

Los Angeles Municipal Code

The City of Los Angeles Municipal Code (the “LAMC”) contains a number of regulations that would apply to the Project’s temporary construction activities and long-term operations.

Section 41.40(a) would prohibit the Project’s construction activities from occurring between the hours of 9:00 P.M. and 7:00 A.M., Monday through Friday. Subdivision (c) would further prohibit such activities

Section 112.05 of the LAMC establishes noise limits for powered equipment and hand tools operated within 500 feet of residential zones. Of particular importance is subdivision (a), which institutes a maximum noise limit of 75 dBA at 50 feet for the types of construction vehicles and equipment that would be required for the Project’s construction. However, the LAMC notes that these limitations would not necessarily apply if it can be proven that compliance would be technically infeasible despite the use of noise-reducing means or methods.

Section 112.01 of the LAMC would prohibit any amplified noises, especially those from outdoor sources (e.g., outdoor speakers, stereo systems, etc.) from exceeding the ambient noise levels of adjacent properties by more than 5 dBA. Any amplified noises would also be prohibited from being audible at any distance greater than 150 feet from the Project’s property line, as the Project is located within 500 feet of residential zones.

Federal Transit Administration (FTA)

For the evaluation of construction-related vibration impacts, Federal Transit Administration (FTA) guidelines and recommendations are used given the absence of applicable federal, County, or City standards specific to temporary construction activities.

Though not regulatory in nature, the FTA has established vibration impact criteria for buildings and other structures, as building and structural damages are generally the foremost concern when evaluating the impacts of construction-related vibrations. **Table 5.13-3** shows the FTA’s vibration

guidelines for building and structural damage.

Table 5.13-3
FTA Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.	

Existing Conditions

Project Site

The Project Site is currently developed with a 14 story mixed-use building containing 194 dwelling units and 9,533 square feet of commercial space, as well as an associated 219 space surface parking lot. The western portion of the Project Site also contains a surface parking lot that is used to store movie and TV prop cars and trucks. The Project Site is bounded by Titus Street to the north, Van Nuys Boulevard to the east, and commercial uses to the south and west.

Due to current COV-19 related shutdowns and closures, it is not possible to measure what ambient noise levels in the vicinity of the Project might typically be. As traffic volumes are markedly reduced, current ambient noise levels are not indicative of typical environmental conditions. However, A Draft EIR for the Icon at Panorama Project, located at 14651-14697 Roscoe Boulevard, approximately 750 feet northwest of the Project, contains ambient noise measurement data that was gathered by Cadence Environmental Consultants in 2016. The DEIR notes that noise levels along Roscoe Boulevard were 72.1 dBA L_{eq} , while noise levels along nearby two residential roadways, Cedros Avenue and Tobias Avenue, were 55.1 dBA L_{eq} and 61.3 dBA L_{eq} , respectively. These noise levels are typical and in line with expectations. Roscoe Boulevard, as a major thoroughfare, would be expected to experience noise levels of 70 dBA L_{eq} or greater. Residential streets directly accessing major arterial roadways also often experience noise levels between 55 and 65 dBA L_{eq} , depending on traffic levels. Noise levels surrounding the Project may differ slightly, but are likely to be commensurate with these values. For example, it is likely that locations adjacent to Van Nuys Boulevard experience noise levels of 70 dBA L_{eq} or greater, and it is likely that Titus Street and Lanark Street experience noise levels between 55 and 65 dBA L_{eq} .

Noise-Sensitive Receptors

There are a number of noise-sensitive land uses in the vicinity of the Project. Nearby noise-sensitive receptors include, but are not limited to, the following:

- Church Receptors: The Project is located approximately 110 feet west of multiple church land uses located across Van Nuys Boulevard: Iglesia Cristo Te Llama USA (8146 Van Nuys Boulevard), Iglesia del Nombre de Jesus Fuego Pentecostal (8146 Van Nuys Boulevard), and Iglesia Pentecostes El Nuevo (8156 Van Nuys Boulevard).

- Residential Receptors: The Project is located approximately 350 feet west of a single-family residential neighborhood to the east of Van Nuys Boulevard. Other multi-family residential receptors to the northeast and east are located nearly 500 feet or more away.
- School Receptors: The Project is located approximately 420 feet west of Michelle Obama Elementary School (8150 Cedros Avenue) classrooms and 390 feet north of Panorama High School (8015 Van Nuys Boulevard) classrooms.

A map identifying the location of these receptors is included in **Appendix G**. Other noise-sensitive land uses and receptors are located in excess of 500 feet from the Project and, as a result, are unlikely to experience audible noises from the Project's on-site construction activities. The Project is located in a relatively high-noise environment along Van Nuys Boulevard. On-site construction noises are not likely to be audible past a few hundred feet, and numerous intervening structures would also obstruct line of sight noise travel and further attenuate noise levels at more-distant receptors.

Methodology

The following section discusses the methods used to analyze the Project's noise impacts:

On-Site Construction Activities

The Project's construction noise impact associated with its on-site construction activities was determined by identifying the source noise levels of the Project's potential construction equipment at a reference distance of 50 feet and comparing them to the 75 dBA at 50 feet standard set by Section 112.05 of the LAMC, as the Project is within 500 feet of residential zones located west of Van Nuys Boulevard. Reference equipment noise levels were obtained from the Federal Highway Administration's Roadway Construction Noise Model, version 1.1 (FHWA RCNM 1.1).

Off-Site Construction Activities

The Project's off-site construction noise impact from haul trucks was assessed by estimating the Project's number of haul trips and comparing this figure with surrounding traffic levels to determine significance.

On-Site Operational Noise Sources

The Project's potential to result in significant noise impacts from on-site operational noise sources was assessed by identifying likely on-site noise sources and considering the impacts they could produce given the nature of the source (i.e., loudness and/or whether noise would be generated during daytime or more-sensitive nighttime hours), distances to nearby noise-sensitive receptors, surrounding ambient noise levels, the presence of similar noise sources in the vicinity, and maximum allowable noise levels permitted by the LAMC.

Off-Site Operational Noise Sources

The Project's off-site operational noise impact from its related traffic generation was assessed by comparing the Project's estimated trip generation with surrounding traffic levels to determine significance.

Construction Vibration Sources

The Project's potential to generate damaging levels of groundborne vibration was analyzed by identifying construction vibration sources and estimating the maximum vibration levels that they could produce at nearby buildings, all based on the principles and guidelines recommended by the FTA in its 2018 Transit Noise and Vibration Impact Assessment manual. Vibration levels were then compared with the manual's suggested damage criteria for various building categories (**Table 5.13-3**).

Operational Vibration Sources

Significant sources of operational vibration are generally limited to heavy equipment or industrial operations. The Project proposes to construct a hospital, and no such operations would take place.

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

Less Than Significant Impact.

Based on guidelines from the City of Los Angeles Department of Planning, the Project's on-site construction noise impact would be considered significant if construction noise levels would exceed the 75 dBA at 50 feet maximum noise level limit for powered equipment as established by Section 112.05 of the LAMC. This regulation applies to the on-site operations of powered construction equipment and not to road-legal trucks operating on public rights-of-way.

In addition to applicable City standards and guidelines that would regulate or otherwise manage the Project's operational noise impacts, the following criteria are adopted to assess the impacts of the Project's operational noise sources:

- Project operations would cause ambient noise levels at off-site locations to increase by 3 dBA CNEL or more to or within "normally unacceptable" or "clearly unacceptable" noise and land use compatibility categories, as defined by the City's General Plan Noise Element (see **Table 5.16-2**).
- Project operations would cause any 5 dBA or greater noise increase.¹⁵²

On-Site Construction Activities

The proposed construction would generate noise during the estimated 27 months of phased demolition, grading, building construction, and coatings activities. The Project would be developed over the course of two non-overlapping construction phases. First, the Parking Building and the

¹⁵² As a 3 dBA increase represents a barely noticeable change in noise level, this threshold considers any increase in ambient noise levels to or within a land use's "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories to be significant so long as the noise level increase can be considered barely perceptible. For instances when the noise level increase would not necessarily result in "normally unacceptable" or "clearly unacceptable" noise/land use compatibility, a readily noticeable 5 dBA increase would still be considered significant. Increases less than 3 dBA are unlikely to result in noticeably louder ambient noise conditions and would therefore be considered less than significant.

surface parking lot would be constructed. Following this, the rest of the site would be graded and construction of the Proposed Building and pool area would begin. During all construction phases, noise-generating activities would be permitted to occur at the Project site between the hours of 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with Section 41.40(a) of the LAMC. On Saturdays, construction activities would be permitted to occur between 8:00 A.M. and 6:00 P.M.

On-site demolition and grading activities would include the use of heavy equipment such as excavators, loaders, and bulldozers. After the completion of these activities, smaller vehicles such as forklifts and skid steer loaders would be required for remaining construction phases. Other equipment such as generators and various powered hand tools would be used throughout all construction phases.

Regulatory compliance with LAMC Section 112.05 would ultimately limit any noise levels from powered construction equipment to 75 dBA at 50 feet or below, as the Project site is located within 500 feet of residential-zoned neighborhoods. Standard, industry-wide “best practices” for construction in urban or otherwise noise-sensitive areas would ensure that the Project’s powered construction equipment noise levels do not exceed the City’s 75 dBA at 50 feet threshold of significance. “Best practices” utilized by the Project would include the following:

- Erecting temporary noise barriers around the Project’s perimeter prior to the commencement of major noise-generating construction activities. The height and material of the noise barriers would be designed to achieve a noise reduction of at least 10 dBA at 50 feet.
- Erecting a temporary noise barrier “penalty box” for truck-mounted cranes, concrete pumping trucks, and concrete mixing trucks that may be permitted to temporarily operate from adjacent on-street parking spaces or public right-of-way, outside the confines of the Project’s perimeter noise barriers. The height and material of the noise barriers would be designed to achieve a noise reduction of at least 10 dBA at 50 feet.
- Warming-up or staging equipment away from noise-sensitive receptors.
- Placing generators, compressors, and other noisy equipment within acoustic enclosures or behind baffles or screens, especially when such equipment has line of sight to nearby noise-sensitive receptors and is not located within the confines of the Project’s perimeter noise barriers.

As shown in **Table 5.13-4**, use of these industry standard best practices would ensure that the Project’s powered equipment noise levels do not exceed the 75 dBA at 50 feet limit that is established by LAMC Section 112.05 and recommended as the threshold of significance by the City of Los Angeles Department of Planning. Therefore, because the Project would comply fully with LAMC Section 112.05, its construction noise impact from on-site sources would subsequently be considered less than significant.

Table 5.13-4
Construction Noise Levels

Powered Construction Equipment	dBA L _{eq} 1-hour at 50 feet	Noise Reduction	dBA L _{eq} 1-hour at 50 feet After Best Practices	Consistent with LAMC Sec.112.05?
Auger Drill Rig	77.4	-10	67.4	Yes

Compressor (air)	73.7	-5	68.7	Yes
Concrete Saw	82.6	-10	72.6	Yes
Crane	72.6	-10	62.6	Yes
Truck-Mounted Crane ^A	83.0	-10	73.0	Yes
Dozer	77.7	-10	67.7	Yes
Excavator	76.7	-10	66.7	Yes
Front End Loader	75.1	-10	65.1	Yes
Generator	77.6	-5	72.6	Yes
Generator (<25KVA)	69.8	-5	64.8	Yes
Gradall	79.4	-10	69.4	Yes
Jackhammer	81.9	-10	71.9	Yes
Roller	73.0	-10	63.0	Yes
Welder/Torch	70.0	-5	65.0	Yes
^A Truck-mounted crane noise level was sourced from the FTA's Transit Noise and Vibration Impact Assessment manual, as this equipment is not represented in FHWA RCNM 1.1. Source: Noise levels derived from the Federal Highway Administration's Roadway Construction Noise Model, version 1.1 (FHWA RCNM 1.1).				

Adherence to the aforementioned best practices would ensure that no substantial construction-related noise increases occur at nearby sensitive receptors. At the nearest sensitive receptors, church land uses located approximately 110 feet east of the Project across Van Nuys, noise levels from construction equipment operating on site would not be likely to exceed approximately 65 dBA L_{eq} at most. And given the size of the Project Site, most construction activities would occur in excess of the minimum Project-to-receptor distance and would therefore result in even lower noise levels at these church land uses. Because Van Nuys Boulevard is a major arterial roadway with high levels of daily traffic, daytime noise levels at these church land uses are likely to be approximately 70 dBA L_{eq} or higher. As a result, the Project's construction noise levels would not be capable of substantially increasing exterior noise levels at these church receptors. Other receptors, such as nearby residential land uses and schools, are located 350 feet or greater from the Project Site and are not likely to experience sustained construction noise levels in excess of 50 dBA L_{eq} , which would not be capable of increasing their respective ambient noise conditions by a substantial or otherwise unreasonable degree.

Off-Site Construction Activities

Section 112.05 of the LAMC does not regulate off-site noise emissions from road legal trucks such as delivery vehicles, concrete mixing trucks, pumping trucks, haul trucks, and worker vehicles. However, the operations of these vehicles would still comply with the construction restrictions set forth by Section 41.40 of the LAMC.

Trucks and other construction-related vehicles would access the Project site over the course of all construction phases. During the Project's grading phase, an estimated 14 haul trips would export soils to a dumpsite in the City of Azusa. The addition of 14 haul trips to surrounding roadways with thousands of daily vehicle trips would have a nominal effect on roadside ambient noise levels, and the Project's noise impact from off-site construction sources would be less than significant.

On-Site Operational Noise

The Project's potential on-site operational noise sources are identified and discussed below:

Mechanical Equipment. Regulatory compliance with LAMC Section 112.02 would ultimately ensure that noises from mechanical 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, distances to receptors, surrounding ambient noise levels, and the relatively quiet operation of modern HVAC systems, it is unlikely that the Project's HVAC systems would be capable of increasing off-site noise levels by a discernable degree. Furthermore, many surrounding land uses also contain rooftop-mounted HVAC equipment (or noisier window-mounted units). Given these considerations, the Project's HVAC systems would not have a substantial effect on surrounding ambient noise conditions. LAMC Section 112.02 would also regulate the Project's pool pumping and filtering equipment noises, but it is unlikely that the operations of this equipment would be audible off-site at all, let alone noisy enough to cause 5 dBA increases at surrounding properties.

Auto-Related Activities. The Project would include a total of 516 parking spaces, 504 of which would be located within the 3-level Parking building and 12 that would be located in a surface parking lot. Noise associated with these parking areas would include vehicle circulation, doors slamming, engines starting, etc. According to FTA equations for the prediction of parking facility noise impacts, a facility with an hourly activity of 82 vehicles (equal to the Project's maximum peak hour trip generation) would be expected to result in a noise level of just 45.5 dBA L_{eq} at a reference distance of 50 feet. Such a noise level would have a negligible impact on surrounding ambient noise conditions.

Pool Area and Open Space. The primary source of noise associated with the Project's pool area and other open spaces would be speech/conversation from Project users. Vocal noise from speech/conversation averages between 55 and 67 dBA at a reference distance of one meter, in proportion to background noise levels.¹⁵³ Given the rapid attenuation of speech/conversation noise, surrounding ambient noise conditions, and distances to noise-sensitive uses, reasonable use of these spaces would not result in discernible noise increases at nearby sensitive receptors.

Retail Space. The Proposed Building would include 2,450 square feet of ground-floor retail space fronting Van Nuys Boulevard. Van Nuys Boulevard in the vicinity of the Project contains numerous commercial retail land uses, and the Project's inclusion of similar uses would not have the potential to substantially alter ambient noise conditions along the boulevard.

Overall, the Project would not alter the environmental noise profile of its surroundings by a substantial degree, and the impact of on-site operational noise sources would be less than significant.

Off-Site Operational Noise

The Project is estimated to result in 885 daily trips, including 66 A.M. peak hour trips and 87 P.M. peak hour trips.¹⁵⁴ A screening level analysis indicates that Project traffic would not increase noise levels associated with nearby roadways by greater than 0.1 dBA during either the A.M. or P.M. peak hour. As such, the Project would have no potential to increase roadway noise levels by at

¹⁵³ EPA, Speech Levels in Various Noise Environments, May 1977.

¹⁵⁴ Transportation Assessment, Overland, May 2020.

least 3 dBA CNEL, which corresponds with an approximate doubling of traffic volume, and this impact would be less than significant.

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

Less Than Significant Impact.

there are no federal, state, county, or City standards that would regulate the Project's vibration impacts from temporary construction activities, nor are there quantitative thresholds. As a result, based on guidance from the City of Los Angeles Department of Planning, the criteria identified by the FTA in its 2018 Transit Noise and Vibration Impact Assessment manual (see **Table 5.13-3**) are used where applicable and relevant to assist in analyzing the Project's groundborne vibration impacts as they pertain to Appendix G checklist question (b).

Building Damage Vibration Impact

Construction vehicles accessing the Project will not idle or queue on any street but rather will queue and stage on the Project Site. Though it is uncommon for groundborne vibrations caused by vehicles to be perceptible, this would ensure that large construction trucks, such as cement mixing trucks and semi-trucks, do not produce continuous groundborne vibrations that could annoy residents or interfere with medical imaging equipment.

Construction of the Project would require equipment such as excavators, auger drill rigs, loaders, and bulldozers. Auger drill rigs and large, track-mounted grading vehicles can produce vibration levels of 0.089 inches per second PPV at a reference distance of 25 feet. Other construction vehicles and equipment would have lesser impacts. The Project would not require impact or vibratory pile driving. **Table 5.13-5**, below, shows the Project's estimated vibration impacts at the nearest off-site structures. As shown, the Project's construction activities would not be capable of generating groundborne vibration levels in excess of FTA building damage criteria, and the Project's impact would be considered less than significant.

**Table 5.13-5
Building Damage Vibration Levels at Off-Site Structures – Unmitigated**

Off-Site Structures	Distance to Site (feet)	Condition	Significance Criteria (in/sec PPV)	Impact (in/sec PPV)	Significant?
<i>Equipment: Excavators and large, track-mounted grading equipment; drill attachments</i>					
14600 Titus St. – Commercial	10	I. Reinforced concrete, steel, or timber	0.5	0.352	No
Panorama Plaza Medical Building	10	I. Reinforced concrete, steel, or timber	0.5	0.352	No
14545 Lanark St. – Office/Commercial	65	I. Reinforced concrete, steel, or timber	0.5	0.021	No
14547 Titus St. – Office/Commercial	60	I. Reinforced concrete, steel, or timber	0.5	0.024	No

Operational Vibrations Impact

During Project operations, there would be no significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. The Project's related vehicle travel would not be considered a significant source of vibration, as vehicle travel rarely generates perceptible groundborne vibration. As a result, the Project's potential to generate excessive ground-borne vibration levels due to its operations would be less than significant.

- 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 airstrip, would the project expose people residing or working in the project area to excessive noise levels?**

No Impact.

The Project would not expose people to excessive noise levels related to the operation of a public airport or private airstrip. The Project is not within an airport hazard area.¹⁵⁵ The Project Site is not located within two miles of a public airport:

- Van Nuys Airport is 2.15 miles to the west.
- Whiteman Airport is 3.30 miles to the northeast.
- Hollywood Burbank Airport (Bob Hope Airport) is 4.75 miles to the southeast.
- Santa Monica Municipal Airport is located 13.75 miles to the south.
- Los Angeles International Airport (LAX) is approximately 18.5 miles to the south.

There are no nearby private airstrips. The Goodyear Blimp Airbase in Carson is located approximately 28 miles to the south.

Given the distance between the Project Site and the listed airports, the Project would not have the potential to result in a safety hazard or excessive noise. Therefore no impact would occur.

Cumulative Impact

Less Than Significant Impact.

Related Project No 24 (14545 Lanark) is the closest related project, just south of the Site, fronting Lanark. As shown in the analysis above, the Project would have a less than significant impact on sensitive receptors. The related project is expected to be evaluated in its own environmental analysis.

¹⁵⁵ ZIMAS search: <http://zimas.lacity.org/>.

The Project and other related projects are physically separated. Noise levels attenuate with distance. As such, on site noise from the Project, whether during construction or operation, would not cumulatively combine with noise from the site of the related projects. Off-site noise associated with the Project would consist of traffic noise from Project-related traffic. While the Project combined with the related projects would cumulatively increase area traffic, together they would not contribute to a doubling of traffic volumes. As such, they would not cause a noticeable increase in ambient noise. Therefore, the Project would not make a considerable contribution to a significant cumulative effect.

XIV. POPULATION AND HOUSING

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

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

Less Than Significant Impact.

Construction Impacts

Construction job opportunities created as a result of the Project are not expected to result in any substantial population growth in the area. The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Additionally, the construction workers would likely be supplied from the region's labor pool. Construction workers would not be likely to relocate their household as a consequence of working on the Project, and as such, significant housing or population impacts will not result from construction of the Project. Therefore, impacts will be less than significant.

Operational Impacts

The Regional Housing Needs Assessment (RHNA) is the State required process that seeks to ensure cities and counties are planning for enough housing to accommodate all economic segments of the community. For this current 2021-2029 Housing Element 6th cycle, the regional Southern California Association of Governments (SCAG) issued a target of 456,643 housing units for the entire City of Los Angeles, of which 184,721 units (40%) are designated for very low-and low-income households.

On June 14, 2022, the Los Angeles City Council adopted the targeted amendments to the 2021-2029 Housing Element (Council File No. 21-1230-S1). The amended Housing Element was provided to HCD immediately after its adoption for review and certification.¹⁵⁶ On June 29,

¹⁵⁶ Los Angeles, Housing Element 2021-2029, news: <https://planning.lacity.org/plans-policies/community-plan-update/housing-element-news/city-council-adopts-targeted-amendments>

2022, HCD confirmed that the amended Housing Element is in full compliance with State Housing Element Law.¹⁵⁷

Table 5.14-1, Population, Households, and Employment in the City of Los Angeles, includes the 2023 (baseline) and 2027 (buildout year) population¹⁵⁸, households¹⁵⁹, and employment¹⁶⁰ values from SCAG's 2020-2045 RTP/SCS.

**Table 5.14-1
Population, Households, and Employment in the City of Los Angeles**

Year	Population	Households	Employment
2023	4,181,470	1,468,827	1,917,720
2027	4,288,710	1,528,590	1,957,387
Projected Growth	+107,240	+59,763	+39,667
Population, housing, and employment calculated based on linear interpolation of 2023 and 2027 values. Based on the adopted 2020-2045 Regional Transportation Plan by SCAG: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579 Table: CAJA Environmental Services, February 2023.			

Population generation is shown in **Table 5.14-2**. It is estimated that the Project would have approximately 484 residents.

**Table 5.14-2
Project Estimated Population Generation**

Land Use	Quantity	Population Generation Rates	Total Population
Residential	200 units	2.42 person / unit	484
Note: unit = dwelling unit Source: The source for the 2.42 persons-per-household rate for the City is Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019. Table : CAJA Environnemental Services, May 2020.			

Employee generation is shown in **Table 5.14-3**. It is estimated that the Project would have approximately 6 employees.

157 California Department of Housing and Community Development: <https://planning.lacity.org/odocument/c30f832f-9f91-47ff-bcc0-69f33b197a11/LACityAdoptedIN062922.pdf>

158 The interpolated value is calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to 2023. Population between 2016 (3,993,800) and 2045 (4,771,300) is projected to grow by 777,500 over the 29-year period, or 26,810 per year average.

159 The interpolated value is calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to 2023. Households between 2016 (1,367,000) and 2045 (1,793,000) is projected to grow by 426,000 over the 29-year period, or 14,690 per year average.

160 The interpolated value is calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to 2023. Employment between 2016 (1,848,300) and 2045 (2,135,900) is projected to grow by 287,600 over the 29-year period, or 9,917 per year average.

Table 5.14-3
Project Estimated Employment Generation

Land Use	Size	Employee Generation Rates	Total Employees
Commercial	2,060 sf	1 employee / 369 sf	6
Note: sf = square feet Source: LAUSD 2022 Developer Fee Justification Study, March 2022. Table 14. Table : CAJA Environmental Services, August 2022.			

The July 2022 unemployment rate in the Los Angeles-Long Beach-Glendale area is approximately 5.0 percent.¹⁶¹ Thus, there is still potential for employment capacity (jobs) to increase to fulfill demand. The Project is not a unique use to compel substantial new residents to the area to fulfill the jobs. Rather the jobs could be filled by workers already counted within the Los Angeles area.

As shown in **Table 5.14-4**, the estimated 484 new residents generated by the Project would represent 0.45 percent of the population growth forecasted between 2023 and 2027. Therefore, the Project's residents would be well within SCAG's projection for the City of Los Angeles.

The Project's 200 new residential units would constitute up to approximately 0.33 percent of the housing growth forecasted between 2023 and 2027. Therefore, the Project's housing units would be well within SCAG's projection for the City of Los Angeles.

The Project's 6 new employees would constitute up to approximately 0.01 percent of the employee growth forecasted between 2023 and 2027. Therefore, the Project's employees would be well within SCAG's projection for the City of Los Angeles. This is a conservative growth as some employees could come from the area.

Table 5.14-4
Project Impacts

	Project	Projected Growth	% of Growth
Population	484	+107,240	0.45
Households	200	+59,763	0.33
Employment	6	+39,667	0.01
Table: CAJA Environmental Services, February 2023.			

As emphasized in many regional and local planning documents, including the City of Los Angeles General Plan Housing Element, the City is in need of new dwelling units to serve both the current population and the projected population. The Project would add 200 units to the existing 194 units, which will remain. The Project will not conflict with the Housing Element, which requires that the City must show it has adequate land zoned to accommodate the RHNA allocation of 456,643 housing units for 2021-2029.¹⁶² Thus, the Project, which is adding housing units, will not result in a net loss of housing inventory in the area. By developing new residential dwelling units, the Project would help to fulfill this demand.

¹⁶¹ Bureau of Labor Statistics: http://www.bls.gov/eag/eag.ca_losangeles_md.htm.

¹⁶² City of Los Angeles, Housing Element, 2021-2029, adopted June 2022.

Infrastructure Impacts

The Project Site is located within an urbanized area. There is adequate infrastructure such as roads and utilities in the Project vicinity. Thus, the construction of potential growth-inducing roadway or other infrastructure extensions would not be required. The Project would not induce substantial population growth and would be supported by existing infrastructure such as roadways. Impacts would be less than significant.

As analyzed above, the net new population and housing that would be generated by the Project would be within SCAG's population and housing projections for the City of Los Angeles. Therefore, the Project would not induce substantial population or housing growth. Further, the mixed-use nature of the Project could be that a new resident and new employee are the same person. Therefore, impacts would be less than significant.

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

No Impact.

A significant impact may occur if a project would result in the displacement of existing people or housing units, necessitating the construction of replacement housing elsewhere. The Project Site does not contain any housing. The Project does not represent a displacement of substantial numbers of existing people or housing. Therefore, no impact would occur.

Cumulative Impacts

Less Than Significant Impact.

Housing and population projections contained in the SCAG forecasts are based upon land uses designated in the General Plan. The related projects and other potential development projects that may occur throughout the City of Los Angeles subregion are expected to be largely consistent with their respective General Plan land use designations. Furthermore, SCAG periodically updates its projections for the various subregions that comprise the SCAG region, which allows these projections to be revised to reflect land use and planning changes that have occurred since previous updates. Accordingly, the effects of cumulative growth associated with the Project and other development within the City of Los Angeles subregion will be accommodated in SCAG forecasts over time and cumulative impacts with respect to housing and population growth would be less than significant.

XV. PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

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

This section is based on the following items, included in **Appendix I** of this SCEA.

I-1 Police Response, Los Angeles Police Department, September 3, 2020.

I-2 School Response, Los Angeles Unified School District, September 15, 2020.

I-3 Parks and Recreation Response, Los Angeles Department of Recreation and Parks, July 17, 2020.

I-4 Library Response, Los Angeles Public Library, August 3, 2020.

a) Fire protection?

Less Than Significant Impact.

Section 35 of Article XIII of the California Constitution at Subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article

XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.¹⁶³

The Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. A total of 1,104 uniformed firefighters (included 242 serving as Firefighters/Paramedics), are always on duty at 106 neighborhood fire stations located in the LAFD's 471-square-mile jurisdiction.¹⁶⁴

Regulations

The LAMC includes provisions for new construction projects within the City. It contains, by reference, the California Building Code building construction standards, including the California Fire Code, and reflects the policies of the City's General Plan Safety Element. The Fire Prevention and Protection Chapter (Chapter V, Article 7) of the LAMC, known as the Los Angeles Fire Code, sets forth regulatory requirements pertaining to the prevention of fires, the investigation of fires and life safety hazards, the elimination of fire and life safety hazards in any building or structure (including buildings under construction), the maintenance of fire protection equipment and systems, and the storage, use, and handling of hazardous materials.¹⁶⁵

Specifically, Section 57.106.5.2 of the LAMC provides that the Fire Chief shall have the authority to require drawings, plans, or sketches as may be necessary to identify: (1) occupancy access points; (2) devices and systems; (3) utility controls; (4) stairwells; and (5) hazardous materials/waste. In addition, Section 57.107.6 requires that the installation, alteration, and major repair of the following be performed under permit of the Department of Building and Safety: Fire Department communication systems, building communication systems, automatic elevators, heliports, emergency power systems, fire escapes, private fire hydrants, fire assemblies, fire protective signaling systems, pilot lights and warning lights for heat-producing equipment, refrigerant discharge systems, smoke detectors, emergency smoke control systems, automatic sprinkler systems, standpipe systems, and gas detection systems. Furthermore, Section 57.118 of the LAMC establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects. The Project will comply with these requirements of the Fire Code, as applicable.

The LAMC addresses access, fire water flow requirements, and hydrants. Specifically, LAMC Section 57.503.1.4 requires the provision of an approved, posted fire lane whenever any portion of an exterior wall is more than 150 feet from the edge of a roadway, while Section 57.507.3.1 establishes fire water flow standards. Fire water flow requirements, as determined by the LAFD, vary by project site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. As set forth in Section 57.507.3.1 of the LAMC, fire water flow requirements vary from 2,000 gallons per minute (gpm) in the Low Density Residential land use category to 12,000 gpm in the High Density Industrial and Commercial land use category, as shown in **Table 5.15-1**. A minimum

¹⁶³ City of Hayward v. Board Trustee of California State University (2015) 242 Cal. App. 4th 833, 847.

¹⁶⁴ http://www.ecodes.biz/ecodes_support/free_resources/2014LACityFire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf.

¹⁶⁵ Ordinance Number 184,913, effective May 19, 2017, updated the Los Angeles Fire Code to incorporate by reference portions of the 2016 edition of the California Fire Code and the 2015 edition of the International Fire Code.

residual water pressure of 20 pounds per square inch (psi) is to remain in the water system with the required gpm flowing.

LAMC Section 57.507.3.2 addresses land use-based requirements for fire hydrant spacing and type. Land uses in the Industrial and Commercial category require one hydrant per 80,000 square feet of land with 300-foot distances between 2.5-inch by 4-inch or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant. If required by the LAFD, the Project will install additional fire hydrant(s) to meet the hydrant spacing requirements as set forth in Section 57.507.3.2 of the LAMC. The number and location of hydrants would be determined as part of LAFD's fire/life safety plan review for the Project.

Section 57.512.1 of the LAMC provides that response distances, which are based on land use and fire flow requirements, shall comply with Table 57.507.3.3 of the LAMC. Based on such requirements, the maximum response distance for the Residential and Commercial land use category from fire stations with an engine company is 1.5 mile, and the maximum response distance from fire stations with a truck company is 2 miles. Where a response distance is greater than that which is allowable, all structures must be constructed with automatic fire sprinkler systems.

Table 5.15-1
LAFD Fire Flow and Response Distance Requirements

Type of Land Development	Fire Flow	Response Distance	
		Engine Co.	Truck Co.
Low Density Residential	2,000 gpm from three adjacent fire hydrants flowing simultaneously	1.5 miles	2 miles
High Density Residential and Neighborhood Commercial	4,000 gpm from four adjacent fire hydrants flowing simultaneously	1.5 miles	2 miles
Industrial and Commercial	6,000 to 9,000 gpm from four to six fire hydrants flowing simultaneously	1 mile	1.5 miles
High Density Industrial and Commercial (Principal Business Districts or Centers)	12,000 gpm available to any block (where local conditions indicate that consideration must be given to simultaneous fires, and additional 2,000 to 8,000 gpm will be required).	0.75 mile	1 mile
Notes: gpm = gallons per minute Land use designations are contained in the community plan elements of the General Plan for the City of Los Angeles. The maximum response distances for both LAFD fire suppression companies (engine and truck) must be satisfied. Source: Los Angeles Fire Code, Table 57.507.3.3,			

Section 57.409 of the LAMC addresses emergency planning and evacuation requirements for high-rise buildings,¹⁶⁶ including the creation and filing of an emergency plan; LAFD approval of emergency plans, procedures, and evacuation signs; required designated personnel; fire drills; fees; and violations. All emergency plans, procedures, and evacuation signs must be completed

¹⁶⁶ The LAMC classifies high-rise buildings as buildings where the highest occupied floor level is more than 75 feet above the lowest point of fire access.

and submitted to the LAFD for inspection and approval prior to their implementation in accordance with Section 57.409.3 of the LAMC. Section 57.409.8.3 of the LAMC requires emergency evacuation signs to be posted in elevator lobbies and adjacent to the doorway leading to the exit stairs. Section 57.409.9.3 of the LAMC requires residential high-rise buildings to conduct mandatory fire drills at least annually under the direction of a designated Fire Safety Director.

Existing Stations

Pursuant to Table 507.3.3, the maximum response distance between residential/commercial land use and a LAFD station that houses an engine company¹⁶⁷ is 1.5 mile and a station that houses a truck company¹⁶⁸ is 2 miles. If these response distances are exceeded, installation of an automatic fire sprinkler system is required.¹⁶⁹

The Project Site is served by Fire Station No. 81, as shown in **Table 5.15-2, Fire Stations**.

**Table 5.15-2
Fire Station**

No.	Address	Driving Distance	Equipment	Response Time	Incident Counts
81	14355 Arminta Street	0.6 mile	Assessment Engine Paramedic Ambulance Rescue Ambulance Rehab Air Tender	EMS: 7:48 min Non-EMS: 7:31 min	EMS: 2,814 Non-EMS: 498
Year 2022 (January to July). Non-EMS is fire emergency. EMS is emergency medical service. Light Force: Truck company and single fire engine. Task Force: Truck company and two fire engines. LAFD June 2021 Fire Station Directory. Table: CAJA Environmental Services, August 2022.					

Response Distance

The Project Site is not located within the response distance specified by Table 507.3.3 of the Fire Code. Station No. 81 is approximately 0.6 mile away and contains an engine and ambulance. It does not contain a truck company. Since the response distance is greater than that which is allowable, all structures must be constructed with automatic fire sprinkler systems.

Additionally, the Project will be constructed with fire protection as required by the LAFD Chief, unless other building and safety codes supersede this. The LAFD goal is to reach EMS incidents within 5 minutes 90 percent of the time and fire incidents within 5:20 minutes 90 percent of the time.

¹⁶⁷ LAFD: All LAFD Engines are Triple Combination apparatus, meaning they can pump water, carry hose, and have a water tank: <http://lafd.org/about/apparatus>.

¹⁶⁸ LAFD: Aerial Ladder Fire Engines: <http://lafd.org/about/apparatus>.

¹⁶⁹ http://www.ecodes.biz/ecodes_support/free_resources/2014LACityFire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf.

Construction Impacts

Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As construction activities are temporary in nature and emergency vehicles have a variety of options for dealing with traffic, such as using their sirens to clear a path of travel and/or driving in opposing traffic lanes, construction of the Project would not impact LAFD 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 during construction of the Project.

Emergency Access

Emergency vehicle access to the Project Site will continue to be provided from local and major roadways near the Project Site. The Project would be in compliance with the Fire Code, including any additional access requirements of the LAFD. Additionally, emergency access to the Project Site will be maintained at all times. Therefore, impacts would be less than significant.

Fire Flow

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The quantity of water necessary for fire protection varies with the type of development, occupancy rates, life hazard, and the degree of fire hazard. City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any case, a minimum residual water pressure of 20 pounds per square inch is to remain in the water system while the required gpm is flowing. The fire flow is set at 4,000 gpm from four adjacent fire hydrants flowing simultaneously. The following fire hydrants are the nearest to the Project Site:¹⁷⁰

- Hydrant (ID 74820, size 2 ½ x 4D, 8-inch main) on west side of Van Nuys.
- Hydrant (ID 62285, size 2 ½ x 4D, 8-inch main) on north side of Titus.
- Hydrant (ID 62286, size 2 ½ x 4D, 8-inch main) on northwest corner of Titus and Van Nuys.
- Hydrant (ID 55194, size 2 ½ x 4D, 6-inch main) on southeast corner of Titus and Van Nuys.

Upgrades to the hydrants and system will be evaluated at the plan check phase as is standard City practice. The Project will submit a request to the City of Los Angeles Department of Water and Power (LADWP) to determine whether the pressure in the Project area is sufficient as is standard practice. If it is not, then upgrades to the existing infrastructure may be required. No changes are planned in the near future for new or expanded fire stations in the area, which contains the Project Site.

¹⁷⁰ Navigate LA, Fire Hydrants Layer: <http://navigatela.lacity.org/navigatela/>.

The Project will comply with the required regulations and feasible recommendations of the Fire Department relative to fire safety and emergency access. Those recommendations will be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department prior to the approval of a building permit. This will allow the LAFD to ensure that the Project will not increase demand on the fire department to the extent that a new or expanded facility is needed, the construction of which may cause a significant impact on the environment.

b) Police protection?

Less Than Significant Impact.

A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. The Project Site is served by the City of Los Angeles Police Department's (LAPD) Valley Bureau, which oversees LAPD operations in the Devonshire, Foothill, Mission, North Hollywood, Topanga, Van Nuys, and West Valley.¹⁷¹ The Mission Community Police Station, located at 11121 N. Sepulveda Boulevard, is approximately 4.75 mile driving distance from the Project Site. The Northeast Community service area is 25.1 square miles in size has approximately 225,849 residents.¹⁷²

The Citywide ratio of officers to residents is 1:403.¹⁷³

Construction Impacts

Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. Consequently, developers typically take precautions to prevent trespassing through construction sites. Most commonly, temporary fencing is installed around the construction site.

The Project Site is generally open around its boundaries. The boundaries will need to be secured during construction. The Project Applicant will employ construction security features, such as fencing, which would serve to minimize the need for LAPD services. Temporary construction fencing will be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. The perimeter fence will have gates installed to facilitate the ingress and egress of equipment and construction workers. Where applicable, the construction fence will incorporate a pedestrian walkway with temporary lighting. Should sections of the construction fence have to be removed to facilitate work in progress, barriers and or K-rails will be installed to prevent public entry and theft. These security measures would ensure that valuable materials (e.g., building supplies, metals such as copper wiring) and construction equipment are not easily stolen or abused. Therefore, construction impacts would be less than significant.

Operational Impacts

171 LAPD, Valley Bureau: http://www.lapdonline.org/valley_bureau

172 LAPD: http://www.lapdonline.org/mission_community_police_station/content_basic_view/1738

173 LAPD: 9,990 officers for a population of 4,029,741 as of May 2020.

The Project will generate jobs and an increase in visitors and patrons, especially over the evening and night hours due to the residential uses. As such, the Project could potentially increase the number of police service calls due to an increase in onsite employees and visitors. The potential for crime can be reduced with site-specific designs and features. The Project will include standard security measures such as adequate security lighting, secure key access to residential areas, and residential lobby and leasing area that offers a visual deterrent and human surveillance feature. Parking would be provided in an enclosed below grade levels and as part of the building.

The LAPD will require that the commanding officer of the Community Area be provided a diagram of each portion of the property showing access routes, and any additional information that might facilitate police response.

The Project-generated residents (484 persons) would equate to approximately 1 officers based on the current ratio in the City. This change is not substantial and the Project will contribute sales and property tax revenue into the City's General Fund, which can be used to fund additional resources per the planning and deployment strategies of the LAPD. The Project will not require the construction of a new or expanded police station. Impacts associated with police services would be less than significant.

c) Schools?

Less Than Significant Impact.

A significant impact may occur if a project includes substantial employment or population growth, which could generate demand for additional school facilities. The Project Site is served by the following Los Angeles Unified School District (LAUSD) schools:¹⁷⁴

- Michelle Obama Elementary (K-5), located at 8150 Cedros Avenue
- Vista Middle (6-8), located at 15040 Roscoe Boulevard
- Panorama High (9-12), located at 8015 Van Nuys Boulevard

Enrollment Generation

As shown on **Table 5.15-3**, the Project (directly through the residential use and indirectly through its employees) would generate an increase of approximately 74 students. To be conservative, this analysis assumed that all students generated by the Project will be new to LAUSD. As discussed below, payment of required school fees is deemed to provide full and complete mitigation.

Table 5.15-3
Project Estimated Student Generation

Project		Students Generated			
Source	Quantity	Elementary	Middle	High	Total
Residential	200 units	39	11	21	71
Commercial	2,060 sf	1	1	1	3
Total		40	12	22	74

174 LAUSD School Finder: <http://rsi.lausd.net/ResidentSchoolIdentifier/>.

**Table 5.15-3
Project Estimated Student Generation**

Project		Students Generated			
Source	Quantity	Elementary	Middle	High	Total
The generation factor is from the Los Angeles Unified School District, 2022 Developer Fee Justification Study, March 2022.					
Students per household: 0.1953 elementary, 0.0538 middle; 0.1071 high school.					
Students per 1,000 sf: 0.467 for neighborhood shopping centers					
Since the Study does not specify the grade levels of students that are generated from non-residential land uses, such students are assumed to be divided among the residential generation factors (i.e. approximately 55 percent for elementary, 15 percent for middle, and 30 percent for high school.					
Table: CAJA Environmental Services, August 2022.					

School Fees

California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirements against any construction within the boundaries of the district, for the purposes of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan has been prepared to support the school district's levy of the fees authorized by California Education Code Section 17620. The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA, or other state or local law (Government Code Section 65996). Furthermore, per Government Code Section 65995.5-7, LAUSD has imposed developer fees for commercial/industrial and residential space. Overall, the payment of school fees in compliance with SB 50 would be mandatory and would provide full and complete mitigation of school impacts for the purposes of CEQA. Therefore, impacts would be less than significant.

d) Parks?

Less Than Significant Impact.

A significant impact to parks would occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts. The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. The Public Recreation Plan, a portion of the Service Element of the City's General Plan sets a goal of a parkland acres-to-population ratio of neighborhood and community parks of 4.0 (or 4 acres per 1,000 persons).

Table 5.15-4, Parks and Recreation Centers, lists the parks and recreation centers that are located nearby the Project Site. While the LADRP is currently in the process of implementing the 50 Parks Initiative, these are small pocket parks typically less than half an acre, often only one

tenth of an acre, and have a service radius of one half mile. None of these parks will be sited within half mile from the Project Site.

**Table 5.15-4
Parks and Recreation Centers**

Name	Address
Andres and Maria Cardenas Skate Park	14740 Blythe Street
Marson Street Pocket Park	15262 Marson Street
Panorama Park	8600 Hazeltine Avenue
North Hills Community Park	8756 Parthenia Place
NavigateLA with Recreation and Parks Department layer: http://navigatela.lacity.org/index01.cfm Table: CAJA Environmental Services, July 2020.	

The Project would increase the number of residents and employees at the Project Site. However, employees of commercial developments do not typically frequent parks or recreation centers during work hours, but are more likely to use facilities near their homes during non-work hours.

The Project would include open space, a pool, and private open space and decks. While Project residents would use the on-site open spaces and recreational facilities, it is reasonably foreseeable that Project residents would use nearby parks and recreation facilities.

The City requires developers to dedicate parkland or pay applicable fees (such as dwelling unit construction tax or other applicable park fee) in lieu of parkland dedication. The Project is required to comply with payment of applicable park fees (Quimby or otherwise). However, with the provided on-site and open space and payment of applicable fees, impacts would be less than significant.

e) Other public facilities?

Less Than Significant Impact.

A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities, such as libraries, which would exceed the capacity to service the project site. The City of Los Angeles Public Library (LAPL) provides library services throughout the City through its Central Library, 8 regional branches, and 64 community branches. The LAPL collection has 6.4 million books, magazines, electronic media, 120 online databases, and 34,000 e-books and related media.¹⁷⁵

On February 8, 2007, The Board of Library Commissioners approved a new Branch Facilities Plan. This Plan includes Criteria for new Libraries, which recommends new size standards for the provision of LAPL facilities – 12,500 square feet for communities with less than 45,000 people, 14,500 square feet for community with more than 45,000 people, and up to 20,000 square feet for a Regional branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area. **Table 5.15-5** summarizes these criteria.

¹⁷⁵ LAPL website: <http://www.lapl.org/about-lapl/press/2012-library-facts>.

**Table 5.15-5
Library Building Size Standards**

Library Type	Population Served	Size of Facility (sf)
Local Branch	< 45,000	12,500
Local Branch	> 45,000	14,500
Regional branch	Unspecified	≤ 20,000
Central Library	System-Wide	Unspecified
Level at which new Branch Library is recommended	90,000	12,500-14,500
LAPL Branch Facilities Plan, 2007.		

Table 5.15-6 describes the libraries that would serve the Project.

**Table 5.15-6
Los Angeles Public Libraries**

Name	Address	Size (sf)	Volumes / Circulation	Current Service	Staff
Panorama City Branch	14345 Roscoe Boulevard	12,500	55,339 / 85,427	138,324	9
Van Nuys Branch	6250 Sylmar Avenue	12,814	32,279 / 34,927	81,695	12
Mid Valley Regional	16244 Nordhoff Street	27,981	132,339 / 306,813	60,200	19.5
Staffing is full-time equivalent. Current Service – LA Times Mapping LA and branch library community boundaries. The LAPL does not make targeted projections but rather uses the most recent Census figures to determine if a branch should be constructed in a given area, according to the new Branch Facilities Plan. Table: CAJA Environmental Services, August 2022.					

The Project would not directly necessitate the need for a new library facility. This is because the LAPL has indicated that there are no planned improvements to add capacity through expansion. There are no plans for the development of any other new libraries to serve this community. The LAPL uses the most recent Census figures to determine if a branch should be constructed in a given area. Employees do not typically frequent libraries during work hours, but are more likely to use facilities near their homes during non-work hours.

The City considers features (on-site library facilities, direct support to LAPL) that would reduce the demand for library services. It is likely that the residents of the Project would have individual access to internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations^{176,177} Further, Measure L has provided funds to restore adequate services to the existing library system.

For all of these reasons, it is not anticipated that the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or

176 "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>.

177 "How and Why Are Libraries Changing?" Denise A. Troll, Distinguished Fellow, Digital Library Federation: <http://old.diglib.org/use/whitepaper.htm>.

need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services. Impacts to library service would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

Development of the residential related projects is projected to generate additional employment, housing, and resident population within the study area, which would likely generate additional demands upon fire protection services, police protection services, schools, parks, and library services. As part of the City's annual budget review process, the City assesses the needs for public services and allocates funds via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Project and related projects would contribute. The cumulative impacts upon each of the service providers is addressed below.

Fire

With respect to fire services, the Project, in combination with the related projects, could increase the demand for fire protection services in the LAFD service area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. Over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, cumulative impacts upon LAFD services would be less than significant.

Police

With respect to police services, the Project, in combination with the related projects, would increase the demand for police protection services in the project area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Project and related projects would contribute. In addition, each of the related projects would be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Furthermore, each of the related projects would likely install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment.

Nevertheless, the siting and development of any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Project would not make a cumulatively considerable impact to police protection services, and cumulative impacts on police protection would be less than significant.

Schools

With respect to cumulative impacts upon schools, the Project, in combination with related projects is expected to result in a cumulative increase in the demand for school services within the LAUSD service area. Development of the related projects would likely generate additional demands upon school services. These related projects would have the potential to generate students that would attend the same schools as the Project. However, each of the new housing units would be responsible for paying mandatory school fees as applicable to mitigate the increased demand for school services. Cumulative impacts on schools would be less than significant.

Parks

With respect to cumulative impacts upon parks, development of the Project in conjunction with related projects could result in an increase in permanent residents residing in the surrounding area. Additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential related projects are required to comply with the LAMC which may include payment of Parks and Recreation Fees for market rate residential projects. Each residential related project would also be required to comply with the on-site open space requirements of the LAMC. Therefore, with payment of the applicable recreation fees on a project-by-project basis, the Project would not make a cumulatively considerable impact to parks and recreational facilities, and cumulative impacts would be less than significant.

Libraries

Development of the related projects is projected to generate additional housing and residents within the study area, which would likely generate additional demands upon library services. This increase in resident population would result in a cumulative increase in demands upon public library services. To meet the increased demands upon the City's Public Library system, Los Angeles voters passed a Library Bond Issue for \$178.3 million to improve, renovate, expand, and construct 32 branch libraries. Since the Program's inception in 1998, the Library Department and the Department of Public Works, Bureau of Engineering have made considerable progress in the design and construction of the branch library facilities. Based on the growth forecasts utilized in the 2015-2020 Strategic Plan, much of this growth has already been accounted for in planning new and expanded library facilities. The LAPL is committed to increase the number of people who use the library services, to increase the number of library cardholders and actively promote the robustly market programs and services to increase residents' overall engagement with the libraries. Thus, the additional population generated by the Project and the related projects would not make a cumulatively considerable impact upon the City's library system.

XVI. RECREATION

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

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

Less Than Significant Impact.

A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for public park facilities that exceeds the capacities of existing parks and causes premature deterioration of the park facilities.

The Project would increase the number of residents and employees at the Project Site. Employees and do not typically frequent parks or recreation centers during work hours, but are more likely to use facilities near their homes during non-work hours. The nearby parks and the open space provided on the Site are discussed under Section 15.iv. Parks, above. While the increased residents may lead to physical deterioration of facilities or accelerate deterioration, the payment of Recreation and Park Fees will be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore, impacts would be less than significant.

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

Less Than Significant Impact.

A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. While the increased residents may lead to physical deterioration of facilities or accelerate deterioration, the payment of applicable Recreation and Park Fees will be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

See also the discussion under **Section 5.15** above for cumulative parks. The Project in combination with the related projects would be expected to increase the cumulative demand for parks and recreational facilities in the City of Los Angeles. A number of new parks and renovated park improvements have been made in the area to accommodate cumulative demands created by increased residential development. The related projects that include market-rate residential units would be required to pay park mitigation fees or applicable Quimby fees to mitigate impacts upon park and recreational facilities and to provide additional funds to meet Citywide park goals. Additionally, each related project would be subject to the provisions of the LAMC for providing on-site open space, which is proportionately based on the amount of new development. Because the Project would have a less than significant incremental contribution to the potential cumulative impact on recreational resources, the Project would have a less than significant cumulative impact on such resources.

XVII. TRANSPORTATION

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b.	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☒	☐	☐
c.	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐
d.	Result in inadequate emergency access?	☐	☐	☒	☐

This section is based on the following items, included as **Appendix J** of this SCEA:

J-1 Transportation Assessment, Overland Traffic Consultants, May 2020.

J-2 Approval Letter, Los Angeles Department of Transportation, June 30, 2020.

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

Less Than Significant Impact.

Mobility Plan 2035

Policy 2.3 Pedestrian Infrastructure – Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

Van Nuys Boulevard is identified as a pedestrian segment street. The Project has been designed to improve the continuity of the pedestrian sidewalk by eliminate 2 existing driveways. Providing a safer walkable sidewalk on this portion of Van Nuys Boulevard.

Policy 2.4 Neighborhood Enhanced Network – Provide a slow speed network of locally serving streets.

Van Nuys Boulevard is not identified on the neighborhood network. Willis Avenue south of Chase Street is part of the Neighborhood Network. The Project is not proposing any changes along these streets that would prevent the City from installing additional features as part of the NEN, nor does the Project propose to modify any streets that would increase travel speeds on the neighborhood network.

Policy 2.5 Transit Network—Improve the performance and reliability of existing and future bus service.

The Project is located adjacent to the Van Nuys rail line. The Project does not propose to remove or modify transit facilities in a manner that would negatively impact the reliability of existing transit service.

Policy 2.6 Bicycle Networks – Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.

Van Nuys Boulevard is designated a Tier 1 bicycle lane street. Project development would not preclude development of the bike lanes envisioned in Mobility Plan 2035.

Policy 2.7 Vehicle Network – Provide vehicular access to the regional freeway system.

Van Nuys Boulevard is not identified as a vehicle enhanced street. The Project would not conflict with the street designations and for any roadways identified in Mobility Plan 2035.

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.

Policy 1.5 Plan for Health. Improve Angelenos' health and well-being by incorporating a health perspective into land use, design, policy, and zoning decisions through existing tools, practices, and programs.

The Project prioritizes safety and access for all individuals utilizing the site by complying with all ADA requirements and providing direct connections to pedestrian amenities along the Project frontage. The Project supports healthy lifestyles by locating housing and jobs near transit, providing bicycle parking, and designing a more comfortable environment for pedestrians.

Policy 1.7 Displacement and Health. Reduce the harmful health impacts of displacement on individuals, families and communities by pursuing strategies to create opportunities for existing residents to benefit from local revitalization efforts by: creating local employment and economic opportunities for low-income residents and local small businesses; expanding and preserving existing housing opportunities available to low-income residents; preserving cultural and social resources; and creating and implementing tools to evaluate and mitigate the potential displacement caused by large-scale investment and development.

The Project provides residential housing units, and employment opportunities in close proximity to transit. The Project does not displace any existing housing; rather, it converts vacant space into an active and vibrant mixed-use community with improved mobility options.

Policy 2.1 Access to Goods and Services. Enhance opportunities for improved health and well-being for all Angelenos by increasing the availability of and access to affordable goods and services that promote health and healthy environments, with a priority on low-income neighborhoods.

Consistent. The Project provides employment and entrepreneurial opportunities for both new residents and existing community members through the development of residential and commercial space.

Policy 5.7 Land Use Planning for Public Health and GHG Emission Reduction. Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.

The Project is estimated to generate lower VMT per capita for residents than the average for the area. Additionally, the Project incorporates several TDM measures to reduce the number of single occupancy vehicle trips to the Project Site, including a reduced parking supply, unbundled parking, and the provision of bicycle parking per the LAMC. VMT directly contributes to GHG emissions, so a reduced VMT per capita also reduces GHG per capita.

The Project prioritizes safety and access for all individuals utilizing the site by complying with all ADA requirements and providing direct connections to pedestrian amenities along the Project frontage. Further, the Project supports healthy lifestyles by locating housing and jobs within a TPA and HQT, providing bicycle parking, and designing a more comfortable environment for pedestrians. Thus, the Project would be consistent with the goals of Plan for a Healthy Los Angeles.

Citywide Design Guidelines

The Pedestrian-First Design approach of the Citywide Design Guidelines (Los Angeles City Planning Urban Design Studio, October 2019) identifies design strategies that “create human scale spaces in response to how people actually engage with their surroundings, by prioritizing active street frontages, clear paths of travel, legible wayfinding, and enhanced connectivity. Pedestrian-First Design promotes healthy living, increases economic activity at the street level, enables social interaction, creates equitable and accessible public spaces, and improves public safety.” The Pedestrian-First Design guidelines are as follows:

- Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.
- Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.
- Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

The Project design includes separate bicycle, pedestrian, and vehicular access points and trees to provide adequate shade and enhance the pedestrian environment in accordance with the City’s design considerations. Additionally, the Project will be oriented toward Van Nuys Boulevard and the active ground floor facilities will ensure the Project engages with the street and its surrounding uses. Thus, the Project design provides for the safety, comfort, and accessibility of pedestrians, aligning with the Pedestrian-First Design approach.

Transit Enhanced Network, Pedestrian Enhanced Districts, and Bicycle Enhanced Network

As discussed above in the analyses for Policy 2.5 and 2.6, the Project would not conflict with Mobility Plan policies related to transit and bicycle networks.

The Project access locations would be required to conform to City standards and would be designed to provide adequate sight distance, sidewalks, and/or pedestrian movement controls that would meet the City's requirements to protect pedestrian safety. In addition, the proposed driveways would be designed to limit potential impediments to visibility, and the Project would provide a direct and safe path of travel with minimal obstructions to pedestrian movement within and adjacent to the Project Site. Therefore, the Project would not conflict with Mobility Plan policies related to the Transit Enhanced Network, Pedestrian Enhanced Districts, and the Bicycle Enhanced Network.

Transit Oriented Community Guidelines

The Project Site qualifies for Tier 2 TOC incentives. The Project, however, is not seeking any Density Bonus or TOC incentives.

Vision Zero

Van Nuys Boulevard is identified as part of the HIN. However, no Vision Zero projects are currently listed for this segment of Van Nuys Boulevard. The Project would not prevent any future Vision zero project.

Conclusion

See also **Section 5.11** for consistency with the land use element and Community Plan.

As shown in the Transportation Assessment, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, impacts would be less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant with Mitigation Incorporated.

The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its Transportation Assessment Guidelines (TAG) in July 2019. Threshold T-2.1 (Causing Substantial Vehicle Miles Traveled) of the Transportation Assessment Guidelines states that a residential project would result in a significant VMT impact if it would generate household VMT per capita more than 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which it is located.

The Project is in the North Valley APC sub - area which limits daily household VMT per capita to a threshold value of 9.2 and a daily work VMT per employee threshold value of 15.0 (15% below the existing VMT for the North Valley APC).

The Project's household VMT was estimated to be 10.7 per capita for the 200 apartments prior to implementing TDM strategies which is above the North Valley APC threshold value.

The commercial portion of the Project was estimated to generate 4.9 work VMT per employee which is below the North Valley APC threshold value.

The Project household VMT exceeds the North Valley APC threshold, therefore the Project does have a significant impact on household VMT per capita in the North Valley APC prior to implementing TDM mitigation. With the recommended TDM measures listed below, however, the Project will have a household VMT value of 9.2 per capita and will fully mitigate the VMT household impact. See **Table 5.17-1**.

**Table 5.17-1
VMT Analysis Results**

Daily Trips	Daily VMT	Household VMT			Work VMT		
		Per Capita	Threshold	Impact?	Per Employee	Threshold	Impact?
Proposed Project							
984	6,958	10.7	9.2	YES	4.9	15	No
With Mitigation							
885	6,298	9.2	9.2	No	4.9	15	No
Transportation Assessment, Overland, May 2020.							

Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

Mitigation Measure

MM-TRAN-1 Transportation Demand Management (TDM) Program

- **Unbundle Parking** - This strategy unbundles the parking costs from the property costs, requiring those who wish to purchase parking spaces to do so at an additional cost from the property cost. The strategy assumes the parking cost is set by the VMT calculator to be a minimum of \$114 per month and paid by the vehicle owners/drivers. Unbundled parking and monthly fees would be part of the leasing and operation plans for the Project. The Project proposed to unbundle parking.
- **Bike Parking** - This strategy involves implementation of short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations under existing LAMC regulations applicable to the Project (LAMC Section 12.21.A.16). The Project provides bicycle parking consistent with LAMC Section 12.21.A.16 - The Project will provide the required 17 short term and 129 long term bike parking spaces for a total of 146 bike parking spaces.

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

Less Than Significant with Mitigation Incorporated.

A significant impact may occur if a project were to include a new roadway design, introduce a new land use or project features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project access or other features were designed in such a way as to create hazardous conditions.

Construction Impact

LADOT generally considers construction-related traffic to cause adverse but not significant impacts because, while sometimes inconvenient, construction-related traffic effects are temporary. LADOT requires implementation of worksite traffic control plans to ensure that any construction-related effects are minimized to the greatest extent possible. To be conservative, a Construction Traffic Management Plan (CTMP) will be implemented (see **MM-TRAN-2**).

Driveways

Changes to the Project Site access will improve roadway and pedestrian conditions. No deficiencies are apparent in the site access plans which would be considered significant. This determination considers the following factors:

1. The Project Site will be served by two existing curb cuts currently on Titus Street, a local street. In addition, development of the Project Site will remove two existing driveways from Van Nuys Boulevard, thereby improving street movement for vehicles, pedestrians, and future bike lanes. The Project's access is consistent with LADOT driveway placement and location per LADOT Manual of Policies and Procedures, Section 321, Driveway Design.
2. No new driveways will be introduced on Van Nuys Boulevard, a Boulevard II street and designated as part of the High Injury Network System.

A review of the Project Site plans does not present any hazardous geometric design features.

Pedestrian Safety

Temporary impacts to pedestrian safety could occur during construction. Safety measures will be implemented (see **MM-TRAN-3**) to ensure the safety of pedestrians and other vehicles in general, as the construction area could create hazards of incompatible/slow-moving construction and haul vehicles. Therefore, impacts would be less than significant.

Pedestrian access to the Project would be provided at entrances along Van Nuys for the ground floor retail and residential lobby. The Project would not mix pedestrian and automobile traffic. Therefore, no impact would occur.

Other Hazards

The Project does not include any sharp curves, dangerous intersections, or incompatible uses. No off-site traffic improvements are proposed or warranted in the area surrounding the Project Site. Therefore, no impact would occur.

LADOT Review and Approval

LADOT reviewed the transportation assessment and issued an approval letter (included as **Appendix I-2** to this SCEA). The results of the traffic analysis, which accounted for other known development projects in evaluating potential cumulative impacts, adequately evaluated the project's traffic impacts on the surrounding community. The Project would follow the conditions of the approval letter.

Mitigation Measures

MM-TRAN-2 Prior to the start of construction, a Construction Traffic Management Plan (CTMP) shall be submitted to LADOT for review and approval. The CTMP will include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicycles, and pedestrians. The CTMP will include, but not limited to, the following measures:

- Maintaining access for land uses in the vicinity of the Project Site during construction.
- Schedule construction materials deliveries during off-peak periods to the extent practical.
- Organize deliveries and staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to surrounding roadways.
- Coordinate deliveries to ensure trucks do not wait to unload or load and impact surrounding roadways, and if needed, utilize an off-site staging area.
- Control truck and vehicle access to the Project Site with flagmen.
- Limit sidewalk and lane closures to the maximum extent possible, and avoid peak period hours to the extent possible. Where such closures are necessary, the Worksite Traffic Control Plan will identify the location of any sidewalk or lane closures and identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity
- Parking for construction workers will be provided either on-site or at off-site, off-street locations.

TRAN-MM-3 Safety Hazards

- The developer shall install appropriate construction related traffic signs around the site to ensure pedestrian and vehicle safety.
- Construction and construction staging shall be planned as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such

as K-Rails or scaffolding) from work space and vehicular traffic, and overhead protection, due to sidewalk closure or blockage, at all times.

- Temporary pedestrian facilities shall be adjacent to the Project Site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- Sidewalk shall be kept open during construction until only when it is absolutely required to close or block sidewalk for construction and/or construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact.

The Project would comply with LAFD and LAPD requirements and provide adequate access for emergency vehicles and service responses.

All Project driveways would be designed according to LADOT standards to ensure adequate access, including emergency access, to the Project Site. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Project. Therefore, impacts would be less than significant.

Cumulative Impact

Less Than Significant Impact.

Pursuant to the TAG, each of the plans, programs, ordinances, and policies to assess potential conflicts with proposed projects should be reviewed to assess cumulative impacts that may result from the Project in combination with other nearby development projects. A cumulative impact could occur if the Project, with other future development projects located on the same block were to cumulatively preclude the City's ability to serve transportation user needs as defined by the City's transportation policy framework. No cumulative impact has been identified with this project that would preclude the City's implementation of any transportation related policies, programs, or standards.

Cumulative VMT impacts are evaluated through a consistency check with the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) plan. The RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas (GHG) reduction targets. The Project represents an infill development that would concentrate new residential and commercial uses within an High Quality Transit Area (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. The Project Site is in a walkable environment near the future East San Fernando rail station, several Metro local and Rapid bus routes and the LADOT Panorama City DASH route. Per the City's TAG, projects that are consistent with the RTP/SCS plan in terms of development location and density are part of the regional solution for meeting air pollution and GHG goals. Projects that have less than a significant VMT impact are deemed to be consistent with the SCAG's 2020-2045 RTP/SCS and would have a less-than-significant cumulative impact on VMT. As shown, the Project VMT impact would not exceed the City's VMT impact threshold and as such, the Project's contribution to the cumulative VMT impact is adequate to demonstrate there is no cumulative VMT impact.

XVIII. Tribal Cultural Resources

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a.	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
b.	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

This section is based on the following item, included as **Appendix K** of this SCEA:

K Sacred Lands File Search, Native American Heritage Commission, July 8, 2020.

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

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Less Than Significant Impact.

According to ZIMAS, the Project Site does not require historic preservation review.¹⁷⁸

There are no Historic Preservation Overlay Zones (HPOZs) around the Project Site.¹⁷⁹

The Project conforms with the Secretary's Standards and will not pose a direct or indirect impact to any of the three identified historical resources in the immediate vicinity within the study area (Panorama Bank Building, Titus Building, Panorama Plaza Building). Therefore, the Project is

¹⁷⁸ ZIMAS search: <http://zimas.lacity.org/>.

¹⁷⁹ HPOZs: <https://planning.lacity.org/preservation-design/local-historic-districts>, accessed August 23, 2022.

anticipated to have a less than significant impact on historical resources.¹⁸⁰

The Project Site has not been listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). Therefore, impacts would be less than significant.

- b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

Less Than Significant Impact.

The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains an existing building and surface parking lot. The Project would require excavation for mechanical uses, utility and foundation work, and grading. There is a possibility of encountering a resource.

The result of any Sacred Lands File (SLF) check conducted through the Native American Heritage Commission was negative.¹⁸¹

The City developed the following standard condition of approval to ensure that if any tribal cultural resources are found during construction of the Project, they will be handled in compliance with state law so that any potential impacts would be less than significant.

Condition of Approval

Inadvertent discovery of tribal cultural resources

In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity), 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 Applicant shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 978-1290.
- If the City determines, pursuant to PRC Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable

¹⁸⁰ Historic Resources Report, Jenna Snow Historic Preservation Consulting, May 2022.

¹⁸¹ Sacred Lands File Search, Native American Heritage Commission, July 8, 2020.

period of time, not less than 30 days, to conduct a site visit and make recommendations to the Applicant 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 Applicant shall implement the tribe's recommendations if a qualified archaeologist and by a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.
- The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
- If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.
- The Applicant 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 by a culturally affiliated tribal monitor and determined to be reasonable and appropriate.
- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

Inadvertent discovery of Human Remains

In the event that human skeletal remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any ground disturbance activities, the following procedures shall be followed:

- Stop immediately and contact the County Coroner:

1104 N. Mission Road
Los Angeles, CA 90033
(323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday), or
(323) 343-0714 (after hours, Saturday, Sunday, and holidays)

- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the NAHC.
- The NAHC will immediately notify the person it believes to be the most likely descendant (MLD) of the deceased Native American.
- The MLD has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the Applicant does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC.

In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements. Based on these conditions, any potential impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

Impacts related to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. Many of the cumulative projects identified would require redevelopment of properties in urban areas that are currently developed and have been previously disturbed, and the potential to encounter and cause a significant impact on tribal cultural resources is diminished. The City would require the applicants of each of the related projects to assess, determine, and mitigate any potential impacts related to tribal cultural resources that could occur as a result of development, as necessary. Compliance with existing laws and the City's conditions of approval, Project impacts associated with tribal cultural resources would be less than significant. However, the occurrence of these impacts would be limited to the Project Site and would not contribute to any potentially significant cultural resources impacts that could occur at the sites of the related projects. As such, the Project would not contribute to any potential cumulative impacts related to tribal cultural resources.

XIX. UTILITIES AND SERVICE SYSTEMS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b.	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e.	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

The section is based on the following items, included as **Appendix L** of this SCEA:

L-1 Wastewater Response, Bureau of Sanitation, July 17, 2020.

L-2 Water and Power Response, Los Angeles Department of Water and Power, October 1, 2020.

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

Less Than Significant Impact.

A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded.

Wastewater

The City of Los Angeles Department of Public Works Bureau of Sanitation (LABS) provides sewer conveyance infrastructure and wastewater treatment services to the City of Los Angeles. The primary responsibility of the LABS is to collect, clean and recycle solid and liquid waste generated by residential, commercial and industrial users. The Bureau manages and administers three primary programs: 1) wastewater collection, conveyance, treatment, and disposal; 2) solid waste

resources collection, recycling and disposal; and 3) watershed protection. The solid waste resources and watershed protection functions are addressed in the following two sections of this chapter, Solid Waste and Stormwater. To comply with the State Waste Discharge Requirements, a Sewer System Management Plan (SSMP) is prepared for each of the City's sanitary sewer systems to control and mitigate all sanitary sewer overflows. The City's wastewater service area consists of two distinct drainage basin areas: the Hyperion Service Area (HSA) and the Terminal Island Service Area (TISA). The HSA covers approximately 515 square miles and serves the majority of Los Angeles. The TISA is approximately 18 square miles and serves the Los Angeles Harbor area.

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LARWQCB discharge policies for the Santa Monica Bay. The HTP currently treats an average daily flow of approximately 275 mgd.¹⁸² Thus, there is approximately 175 mgd available capacity.

Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LAWQCB's discharge policies. The HTP is a public facility and is subject to the state's wastewater treatment requirements. The Project's wastewater discharge would be typical for a mixed-use residential and commercial building and would not require any on-site treatment before flowing to the sewer.

As shown on **Table 5.19-1, Project Estimated Wastewater Generation**, it is estimated the Project will generate a total of approximately 23,862 gallons per day (gpd) (or 0.023 mgd) of wastewater. This total does not take any credit for the proposed sustainable and water conservation features of the Project.

**Table 5.19-1
Project Estimated Wastewater Generation**

Land Use	Size	Wastewater Generation Rates	Total (gpd)
Residential – Studio	2 units	75 gallons / unit	150
Residential – 1 Bedroom	159 units	110 gallons / unit	17,490
Residential – 2 Bedroom	39 units	150 gallons / unit	5,850
Retail	2,060 sf	25 gallons / 1,000 sf	52
Warehouse	10,674 sf	30 gallons / 1,000 sf	320
Total Increase			23,862
Note: sf = square feet; cf = cubic feet; gpd = gallons per day City of Los Angeles Sewer Rates, April 6, 2012. Table: CAJA Environmental Services, August 2022.			

The Project's wastewater generation increase of 0.023 mgd would be served within the remaining capacity currently available at HTP (175 mgd). Therefore, impacts to wastewater treatment facilities and existing infrastructure would be less than significant. If a deficiency or service

¹⁸² https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrlstate=e9g2enwiy_5&_afLoop=2223629005130851#

problem is discovered during the permitting process that prevents the Project from an adequate level of service, the Project Applicant shall fund the required upgrades to adequately serve the Project. This will ensure that the Project's impacts to the wastewater conveyance system would be less than significant.

As HTP complies with the state's wastewater treatment requirements and the Project's wastewater generation is well within the existing capacity, the Project will not exceed the wastewater treatment requirements of LAWQCB. Therefore, impacts would be less than significant.

The Project Site will be served by LA Sanitation, which provides municipal wastewater services to the City. As part of the building permit process the lead agency would confirm and ensure that there is sufficient capacity in the local and trunk lines to accommodate the Project's wastewater flows. The standard procedure is that further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity, then the Applicant shall be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Implementation of these prescribed mitigation measures will ensure that the Project's impacts to the wastewater conveyance system will be less than significant.

Additionally, water conservation measures required by City ordinance (e.g., installation of low flow toilets and plumbing fixtures, limitations on hose washing of driveways and parking areas, etc.) will be implemented as part of the Project and will help reduce the amount of project-generated wastewater.

The wastewater generated by the Project will be similar to other uses in the area. No industrial discharge into the wastewater or drainage system would occur. Additionally, there is adequate treatment capacity within the HTP system and would not have a significant impact on treatment plant capacity.

Water

The Los Angeles Department of Water and Power (LADWP) owns and operates the Los Angeles Aqueduct Filtration Plant (LAAFP) located in the Sylmar community of the City. The LAAFP treats City water prior to distribution throughout LADWP's Central Water Service Area. The designated treatment capacity of the LAAFP is 600 mgd, with an average plant flow of 550 mgd during the summer months and 450 mgd in the non-summer months.¹⁸³ Thus, the facility has between approximately 50 to 150 mgd of remaining capacity depending on the season.

The proposed development land uses will conform to Water-Efficiency Requirements Ordinance No. 180,822, California Plumbing Code, California Green Building Code (CALGreen), Los Angeles Plumbing Code, and Los Angeles Green Building Code.

As shown on **Table 5.19-2, Project Estimated Water Demand**, it is estimated the Project will demand a total of approximately 23,862 gpd (or 0.023 mgd) of water. This is conservative and

¹⁸³ 2015 Urban Water Management Plan, Los Angeles.

does not take credit for the removal of existing uses. This total does not take any credit for the proposed sustainable and water conservation features of the Project.

**Table 5.19-2
Project Estimated Water Demand**

Land Use	Size	Water Demand Rates	Total (gpd)
Residential – Studio	2 units	75 gallons / unit	150
Residential – 1 Bedroom	159 units	110 gallons / unit	17,490
Residential – 2 Bedroom	39 units	150 gallons / unit	5,850
Retail	2,060 sf	25 gallons / 1,000 sf	52
Warehouse	10,674 sf	30 gallons / 1,000 sf	320
Total Increase			23,862
Note: sf = square feet; cf = cubic feet; gpd = gallons per day Wastewater generation is assumed to equal water consumption. City of Los Angeles Sewer Rates, April 6, 2012. Table: CAJA Environmental Services, August 2022.			

The Water Service Organization (WSO) would be able to provide the domestic needs of the Project from the existing water system. The Project Applicant will consult with the LADBS and LAFD to determine fire flow requirements for the Project. This system hydraulic analysis will determine if existing LADWP water supply facilities can provide the proposed fire flow requirements of the Project. If water main or infrastructure upgrades are required, the Applicant would pay for such upgrades, which would be constructed by either the Applicant or LADWP.

The Project's water consumption increase of 0.023 mgd would be served within the remaining capacity currently available at LAAFP during the summer (50 mgd) and non-summer months (150 mgd), respectively. Therefore, impacts to water treatment facilities and existing infrastructure would be less than significant. If a deficiency or service problem is discovered during the permitting process that prevents the Project from an adequate level of service, the Project Applicant shall fund the required upgrades to adequately serve the Project. This will ensure that the Project's impacts to the water conveyance system would be less than significant.

While domestic water demand is typically the main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure, and therefore are the primary means for analyzing infrastructure capacity. Fire flow to the Project would be required to meet City of Los Angeles fire flow requirements. Section 57.507.3.1 of the LAMC establishes fire flow standards for specified land uses, including Low Density Residential, High Density Residential and Commercial Neighborhood, Industrial and Commercial, and High Density Industrial and Commercial or Industrial. Based on fire flow standards set forth in Section 57.507.3.1 of the LAMC, the Project falls within the High Density Residential and Neighborhood Commercial category, which has a required fire flow of 4,000 gallons per minute from four adjacent fire hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch (psi). In accordance with the fire flow standards set forth in the LAMC, the Applicant would coordinate with the City to ensure that adequate water infrastructure is available to meet the required fire flows. Should the City determine that additional water connections and water infrastructure capacity is needed to meet the required fire flows, the Applicant would implement such improvements in consultation with the City. Additionally, as required by the LAMC, hydrants

would be spaced per the hydrant spacing requirements set forth in Section 57.507.3.2 of the LAMC to provide adequate coverage of the building exterior and to deliver a minimum pressure of 20 pounds per square inch at full flow. Therefore, the Project would not result in the construction of new water facilities or expansion of existing facilities.

Stormwater Drainage

As discussed in **Section 5.10**, above, the Project would increase the percentage of pervious surfaces within the Project Site due to an increase in open space and landscaping areas. The Project Site is located in an urbanized area of the City. The Project Site is currently primarily covered with a building and parking lot (hardscape). The Project will similarly occupy the entire Project Site with a new building and parking, as well as paving and landscaping. The Project would not be altering the amount of impervious surface that affects runoff. Runoff currently flows toward the existing storm drain system, and the Project will not substantially alter the amount of runoff. Therefore, stormwater flows from the Project Site would not increase with implementation of the Project. Thus, the existing public stormwater system would have sufficient capacity to accommodate the Project and the Project would not require or result in the construction of new stormwater drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant.

Electric Power

As discussed in **Section 5.6**, above, LADWP has confirmed that electrical service is available and will be provided in accordance with the LADWP's Rules Governing Water and Electric Service. Therefore, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand. Accordingly, operation of the Project would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the relocation or construction of new or expanded electric power facilities, the construction of which would cause significant environmental effects. Impacts would be less than significant.

Natural Gas

As discussed in **Section 5.6**, above, there is sufficient natural gas supplies to serve the Project's natural gas demand. Accordingly, operation of the Project would not result in an increase in demand for natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the relocation or construction of new or expanded natural gas facilities, the construction of which would cause significant environmental effects. Impacts would be less than significant.

Telecommunications

The Project would not require construction of new on-site telecommunications infrastructure to serve the new building and potential upgrades 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. All on-site work would be within overall Project construction, which has been analyzed. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers. Impacts would be less than significant.

- b) Would the project have significant water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

Less Than Significant Impact.

The 2020 UWMP was adopted in May 2021 and projects a demand of 642,600 AFY in 2025 (average weather year).¹⁸⁴ The UWMP forecasts water demand by estimating baseline water consumption by use (single family, multi-family, commercial/government, industrial), then adjusting for projected changes in socioeconomic variables (including personal income, family size, conservation effects) and projected growth of different uses based on SCAG 2020-2045 RTP/SCS.¹⁸⁵ The 2020-2045 RTP/SCS 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).¹⁸⁶ Neither the UWMP forecasts, nor the 2020-2045 RTP/SCS include parcel-level zoning and land use designation as an input.

The 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 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 Project would easily fit.

According to 2020 UWMP, the City has sufficient water supply to meet a total projected water demand through to the year 2045, in a Normal Wet Year, a Single Dry Year, and Multiple Dry Years. The 2020 UWMP also includes a drought risk assessment, which shows that there would be no water shortages over the five-year drought, which started in 2021 (2020 UWMP, page 11-13). As such, the City can provide the needed water from its existing system pursuant of the provisions in 2020 UWMP.

Additionally, the Project Applicant would be required to comply with the water efficiency standards outlined in Los Angeles City Ordinance No. 180822 and in the Los Angeles Green Building Code (LAGBC) to minimize water usage. Further, prior to issuance of a building permit, the Project Applicant would be required to consult with LADWP to determine Project-specific water supply service needs and all water conservation measures that shall be incorporated into the Project. As such, the Project would not require new or additional water supply or entitlements. Therefore, no impact would occur.

¹⁸⁴ 2020 Urban Water Management Plan, Los Angeles, Exhibit ES-S.

¹⁸⁵ 2020 Urban Water Management Plan, Los Angeles, page 1-5.

¹⁸⁶ SCAG, 2020-2045 RTP/SCS, Demographic and Growth Forecast, page 3.

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

Less Than Significant Impact.

A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. The Project's wastewater generation would be sufficiently accommodated as part of the remaining 175 mgd of treatment capacity currently available at HTP. Therefore, impacts to wastewater treatment would be less than significant.

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

Less Than Significant Impact.

County landfills are categorized as either Class III or unclassified landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in unclassified landfills.¹⁸⁷ Ten Class III landfills and one unclassified landfill with solid waste facility permits are currently operating within the County.¹⁸⁸

Based on the information provided in the 2020 Countywide Integrated Waste Management Plan Annual Report, the remaining disposal capacity for the County's Class III landfills is estimated at approximately 142.67 million tons.¹⁸⁹

In 2020, approximately 6.019 million tons of solid waste were disposed of at the County's Class III landfills, 0.244 million tons of inert waste at the County's inert landfill, and 0.338 million tons at transformation facilities.¹⁹⁰ Of the remaining Class III landfill capacity in the County, approximately 74.13 million tons are available to the City.¹⁹¹

As is the case with solid waste haulers, landfills operate in a free-enterprise system. Their operating funds and profits are obtained by collecting disposal fees from the haulers on a per ton

187 Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

188 County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2018 Annual Report, December 2019: <https://dpw.lacounty.gov/epd/swims/>, accessed March 25, 2020.

189 County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-2 Table 4: <https://dpw.lacounty.gov/epd/swims/News/swims-more-links.aspx?id=4#>, accessed April 21, 2022.

190 County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-2 Table 4: <https://dpw.lacounty.gov/epd/swims/News/swims-more-links.aspx?id=4#>, accessed April 21, 2022.

191 Total excludes Class III landfills not open to the City of Los Angeles for disposal (i.e., Scholl Canyon, Whittier, Burbank, Pebbly Beach, and San Clemente). In addition, total excludes the Calabasas Landfill, as its watershed does not include the Project Site. The Chiquita Canyon Landfill Expansion permits the facility to operate until it reaches 60 million tons, or after 30 years, whichever comes first. However, since the current volume of the facility's watershed is unknown, the volume of waste that it would take to reach 60 million tons cannot be determined. As such, for a conservative analysis, the Chiquita Canyon Landfill Expansion is excluded from the total.

basis. Landfill capacity is regulated primarily through the amount of solid waste that each particular facility is permitted to collect on a daily basis relative to its capacity.

The 2020 Annual Report indicates that the countywide cumulative need for Class III landfill disposal capacity, approximately 154.1 million tons in 2031, will exceed the 2020 remaining permitted Class III landfill capacity of 142.67 million tons.

Wasteshed boundaries, geographic barriers, weather, and natural disasters could place further constraints on accessibility of Class III landfill capacity. Therefore, the Annual Report evaluated seven scenarios to increase capacity and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with six of the seven scenarios. The Annual Report also concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail.

The County's unclassified landfill generally does not currently face capacity issues. The remaining disposal capacity for Azusa Land Reclamation is estimated at approximately 64.64 million tons. In 2020, approximately 0.244 million tons of inert waste (e.g., soil, concrete, asphalt, and other construction and demolition debris) were disposed of at this unclassified landfill. Given the remaining permitted capacity, this capacity would be exhausted in 25 years.¹⁹² Thus, the unclassified landfill serving the County has adequate long-term capacity.

While the City's Bureau of Sanitation (BOS) generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. 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.

In 2018, the City disposed of approximately 3.3 million tons of solid waste at the County's Class III landfills, approximately 1,968 tons at transformation facilities, and 214 million tons at the inert landfill.¹⁹³ The 3.3 million tons of solid waste accounts for approximately 4.4 percent of the total remaining capacity (74.13 million tons) for the County's Class III landfills open to the City.¹⁹⁴

The landfills that serve the City and the capacity of these landfills are shown on **Table 5.19.4**. As shown, the landfills have an approximate available daily intake of 11,839 tons.

Table 5.19.4
Landfill Capacity

Landfill Facility	2020 Average Daily Disposal (tons/day)	Maximum Daily Disposal (tons/day)	Remaining Daily Capacity (tons/day)	Remaining Capacity (million tons)	Remaining Life (years)
Class III Landfills (Open to the City)					

¹⁹² County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-2 Table 4: <https://dpw.lacounty.gov/epd/swims/News/swims-more-links.aspx?id=4#>, accessed April 21, 2022.

¹⁹³ These numbers represent waste disposal, not generation, and thus do not reflect the amount of solid waste that was diverted via source reduction and recycling programs within the City

¹⁹⁴ 3.3 million tons ÷ 74.13 million tons x 100% = 4.4%.

Antelope Valley	2,468	5,548	3,080	10.18	9
Lancaster	402	5,100	4,698	9.87	21
Sunshine Canyon	8,039	12,100	4,061	54.08	17
Total	10,909	22,748	11,839	74	
Inert Landfill (Open to the City)					
Azusa	1,032	8,000	6,968	64.64	25
County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-2 Table 4: https://dpw.lacounty.gov/epd/swims/News/swims-more-links.aspx?id=4# , accessed July 7, 2022.					

Construction

Construction of the Project will generate minimal amounts of construction and demolition debris that would need to be disposed of at area landfills. Construction and demolition debris includes concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. California Assembly Bill (AB) 939, also known as the Integrated Waste Management Act, requires each city and county in the state to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. As such, much of this material would be recycled and salvaged. Materials not recycled would be disposed of at local landfills.

See **Table 5.19-5**, for the Project Demolition and Construction Waste Generation. Demolition and construction would generate approximately 3,250 tons of construction waste, prior to any mandatory recycling efforts.

Table 5.19-5
Project Demolition and Construction Waste Generation

Building	Size	Rate	Total (tons)
Demolition Waste			
Residential	0	155 pounds / sf	0
Non-residential	0	173 pounds / sf	0
Asphalt	75,000 sf	75 pounds / sf	2,850
Construction Waste			
Residential	170,568 sf	4.38 pounds / sf	374
Non-residential	13,063 sf	3.89 pounds / sf	26
Total			3,250

**Table 5.19-5
Project Demolition and Construction Waste Generation**

Building	Size	Rate	Total (tons)
Over the entire total schedule of construction. sf = square feet, 1 ton = 2,000 lbs Based on 173 pounds of nonresidential demolition per square foot. (Source: 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 A-3 and Table A-4, pages A-2 to A-3: https://www.epa.gov/sites/production/files/2016-03/documents/charact_bulding_related_cd.pdf U.S. EPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, June 1998. Applied generation rates are averages of empirical waste assessments of residential demolition, non-residential demolition, residential construction, and nonresidential construction waste streams in the United States. Using conservative amount. Based on 3.89 pounds of nonresidential construction and 4.38 lbs for residential construction per square foot. (Source: U.S. Environmental Protection Agency Report No. EPA530-98-010. Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Tables A-1 and A-2, page A-1: https://www.epa.gov/sites/production/files/2016-03/documents/charact_bulding_related_cd.pdf 1 cubic foot of asphalt weights 150 pounds. The asphalt at the site is assumed to be 6 inches thick. Table: CAJA Environmental Services, August 2022.			

This amount of construction and debris waste would represent approximately 0.002 percent of the Azusa Land Reclamation Landfill's existing remaining disposal capacity of 64.64 million tons. Thus, the total amount of construction and demolition waste generated by the Project would represent a fraction of the remaining capacity at the unclassified landfill serving Los Angeles County. Since the County's unclassified landfill generally does not face capacity shortages, and the County's unclassified landfill would be able to accommodate Project-generated waste, construction of the Project would not result in the need for an additional disposal facility to adequately handle Project-generated construction-related waste. Therefore, construction impacts would be less than significant.

Operation

As shown on **Table 5.19-6, Project Estimated Solid Waste Generation**, it is estimated the Project will generate a total of approximately 464 tons per year of solid waste. This total does not take any credit for the proposed sustainable and recycling features of the Project.

**Table 5.19-6
Project Estimated Solid Waste Generation**

Land Use	Size	Solid Waste Generation Rates	Total (tons)
Residential	200 units	2.23 tons / unit	446
Commercial	6 employees	2.98 tons / employee	18
Total Increase			464

**Table 5.19-6
Project Estimated Solid Waste Generation**

Land Use	Size	Solid Waste Generation Rates	Total (tons)
Note: 1 ton = 2,000 pounds. Residential solid waste factor (City of Los Angeles CEQA Thresholds Guide, 2006, page M.3-2) is based on a rate of 12.23 pounds per household per day (or 2.23 tons per household per year). Non-residential solid waste factor (City of Los Angeles Bureau of Sanitation, Waste Characterization and Quantification Study, Table 4, July 2002) is based on tons per employee per year: Table: CAJA Environmental Services, August 2022.			

In compliance with the LAMC, the Project shall provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of nonhazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals.

In compliance with AB341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB3 41.

In compliance with the LAMC, the General Contractor shall utilize solid waste haulers, contractors, and recyclers who have obtained an Assembly Bill (AB) 939 Compliance Permit from the City of Los Angeles Bureau of Sanitation.

The increase in solid waste disposal would represent an approximate 0.06 percent increase in the City's annual solid waste disposal quantity, based on the 2018 disposal of approximately 3.3 million tons.

The increase in solid waste disposal would represent approximately 0.0008 percent of the estimated remaining Class III landfill capacity of 74 million tons available to the City of Los Angeles. Therefore, no Project impacts related to solid waste would occur and the Project is adequately served. Therefore, operation impacts would be less than significant.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact.

A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. Solid waste generated on-site by the Project will be disposed of in compliance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939. The amount of project-related waste disposed of at area landfills would be reduced through recycling and waste diversion programs implemented by the City, in compliance with the City's Solid Waste Integrated Resources Plan, which is the long-range solid waste management policy plan for the City through 2025, and the Source Reduction and Recycling Element, which is the strategic action policy plan for diverting solid waste from landfills.

The Project would also comply with applicable regulatory measures, including the provisions of City Ordinance No. 171,687 regarding recycling for all new construction and other recycling measures; implementation of a demolition and construction debris recycling plan, with the explicit intent of requiring recycling during all phases of site preparation and building construction, and the provision of permanent, clearly marked, durable, source-sorted bins to facilitate the separation and deposit of recyclable materials. Waste generated by the Project would not alter the projected timeline for landfills within the region to reach capacity. The Project would comply with federal, state, and local regulations. Therefore, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact.

Wastewater

Similar to the Project, each related project would be required to obtain approval by the Department of Public Works to ensure adequate sewer capacity for each related project. Since the Proposed Project would require approval from the Bureau of Sanitation, signifying that the sewer lines serving the Project Site have adequate capacity, the Project would not be expected to contribute to a local cumulative impact. Locally, the Project would not be cumulatively considerable. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the HTP's service to the City of Los Angeles and surrounding area. However, it is anticipated that the 175 mgd of available capacity in the HTP would not be significantly reduced with the cumulative wastewater generation from the related projects and Project. As such, cumulative impacts with respect to wastewater demand would be less than significant.

Water

Development of the Project, related projects and the cumulative growth throughout the City of Los Angeles, would further increase the demand for potable water within the City of Los Angeles. Through the 2015 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City of Los Angeles through the year 2040, with implementation of conservation strategies and proper supply management. This estimate is based in part on demographic projections obtained for the LADWP service area from the Metropolitan Water District (MWD). The MWD utilizes a land-use based planning tool that allocates projected demographic data SCAG into water service areas for each of MWD's member agencies. MWD's demographic projections use data reported in SCAG's RTP/SCS. Similar to the Project, each related project would be evaluated to determine whether the water demand was accounted for in the UWMP or would otherwise be required to obtain approval from the LADWP certifying that the LADWP has sufficient water supplies available to serve the project. As such, the additional water demands generated by the Project are accounted for in the 2015 Urban Water Management Plan, and impacts associated with increased water demand would not be cumulatively considerable, and cumulative impacts on water supply would be less than significant.

Solid Waste

Development of the Project in conjunction with the related projects would further increase regional demands on landfill capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the existing landfills serving the City of Los

Angeles. Additionally, by successfully permitting and developing all proposed in-County landfill expansions, utilizing available or planned out-of-County disposal facilities, and developing infrastructure to facilitate exportation of waste to out-of-County landfills, the County may further ensure adequate disposal capacity is available throughout the planning period. Thus, cumulative impacts with respect to regional solid waste impacts would be less than significant. The City is also developing programs to ultimately meet a goal of zero waste by 2030. Thus, the Project's contribution to cumulative impacts would continue to decrease as it increases waste diversion rates in accordance with City goals. Moreover, as with the Project, other related projects would participate in regional source reduction and recycling programs significantly reducing the amount of solid waste deposited in area landfills. Therefore, the Project's contribution to cumulative solid waste impacts would be less than cumulatively considerable, and cumulative impacts with respect to solid waste would be less than significant.

XX. WILDFIRE

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
b.	Due to slope, prevailing winds, or other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c.	Require the installation or maintenance of associate 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?	☐	☐	☐	☒
d.	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

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

No Impact.

At the time of permit review (plan check), the LAFD would review the Project plans for compliance with the Los Angeles Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards and would not approve permits unless emergency access meets their standards, thereby ensuring that the Project would not create any undue fire hazard. Emergency access to the Project Site and surrounding uses would be maintained at all times, as it is under current conditions. Furthermore, the Project's driveway and internal circulation would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Therefore, no impact would occur.

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?

No Impact.

The LAFD currently serves the Project Site. No slope, prevailing wind, or other factors would exacerbate wildfire risks. The Project Site is not located in a Very High Fire Hazard Severity Zone¹⁹⁵ or in the wildlands fire hazard Mountain Fire District.¹⁹⁶ The Project Site is not on the direct edge of a rural or wildland area. Therefore, no impact would occur.

¹⁹⁵ ZIMAS search: <http://zimas.lacity.org/>.

¹⁹⁶ Los Angeles Safety Element, 2021 Update: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, August 23, 2022.

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

No Impact.

Hydrants, water lines, and water tanks would be installed per Fire Code requirements. 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. Automatic fire sprinkler systems are also required for the proposed land uses as part of the Project. No unique infrastructure would be required for the Project related to wildland fire risk. Overall, the Project would not require the maintenance or installation of infrastructure that would exacerbate fire risks or that would result in impacts to the environment. Therefore, no impact would occur.

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

No Impact.

The current slope on the Site will be leveled to provide a flat pad for the proposed building. This process would be done according to LADBS requirements to ensure the building on the top of the slope remains stable. Landscaping and building features would ensure that runoff complies with LID requirements. As discussed in **Section 5.10**, above, the Project would maintain the existing percentage of impervious surfaces within the Project Site. The Project Site is located in an urbanized area of the City. The Project Site is currently primarily covered with buildings and parking lot (hardscape). The Project will similarly occupy the entire Project Site with a new building and parking, as well as paving and landscaping. The Project would not be altering the amount of impervious surface that affects runoff. Runoff currently flows toward the existing storm drain system, and the Project will not substantially alter the amount of runoff. Therefore, no impact would occur.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

Less Than Significant Impact.

The Project is located in a densely populated urban area and would have no unmitigated significant impacts with respect to biological resources or California's history or prehistory. The Project Site does not support any substantial habitat of a fish or wildlife species. Vegetation on the Project Site is limited to trees on the Project Site, trees in the public right-of-way, and limited landscaping. Compliance with standard regulatory compliance would reduce potential impacts upon migratory bird species associated with the proposed tree removals, should construction commence during the breeding season.

Additionally, although no known direct impacts to historic resources are anticipated, compliance with existing regulations would ensure any impacts upon cultural resources are less than significant level in the unlikely event any such historic, archaeological, or paleontological resources are accidentally discovered during the construction process.

Therefore, with adherence to regulatory compliance, the Project would not have the potential to degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history.

- b) **Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of**

a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact.

As concluded in the analysis above, the Project's incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, utilities, tribal cultural resources, and wildland fire hazards would be less than significant. As such, the Project's contribution to cumulative impacts would be less than significant.

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

Less Than Significant Impact.

A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. As described throughout this environmental impact analysis, with implementation of the recommended mitigation measures, where applicable, the Project would not result in any unmitigated significant impacts. Therefore, impacts would be less than significant.

6 SCEA Conditions

The following are the Project-specific conditions imposed on the Project:

- Mitigation measures for transportation
- Condition of Approval for tribal cultural resources and human remains

There are no SCAG mitigation measures imposed on the Project.

There are no Project Design Features.

MITIGATION MEASURES

MM-TRAN-1 Transportation Demand Management (TDM) Program

- **Unbundle Parking** - This strategy unbundles the parking costs from the property costs, requiring those who wish to purchase parking spaces to do so at an additional cost from the property cost. The strategy assumes the parking cost is set by the VMT calculator to be a minimum of \$114 per month and paid by the vehicle owners/drivers. Unbundled parking and monthly fees would be part of the leasing and operation plans for the Project. The Project proposed to unbundle parking.
- **Bike Parking** - This strategy involves implementation of short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations under existing LAMC regulations applicable to the Project (LAMC Section 12.21.A.16). The Project provides bicycle parking consistent with LAMC Section 12.21.A.16 - The Project will provide the required 17 short term and 129 long term bike parking spaces for a total of 146 bike parking spaces.

MM-TRAN-2 Prior to the start of construction, a Construction Traffic Management Plan (CTMP) shall be submitted to LADOT for review and approval. The CTMP will include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicycles, and pedestrians. The CTMP will include, but not limited to, the following measures:

- Maintaining access for land uses in the vicinity of the Project Site during construction.
- Schedule construction materials deliveries during off-peak periods to the extent practical.

- Organize deliveries and staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to surrounding roadways.
- Coordinate deliveries to ensure trucks do not wait to unload or load and impact surrounding roadways, and if needed, utilize an off-site staging area.
- Control truck and vehicle access to the Project Site with flagmen.
- Limit sidewalk and lane closures to the maximum extent possible, and avoid peak period hours to the extent possible. Where such closures are necessary, the Worksite Traffic Control Plan will identify the location of any sidewalk or lane closures and identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity
- Parking for construction workers will be provided either on-site or at off-site, off-street locations.

TRAN-MM-3 Safety Hazards

- The developer shall install appropriate construction related traffic signs around the site to ensure pedestrian and vehicle safety.
- Construction and construction staging shall be planned as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding) from work space and vehicular traffic, and overhead protection, due to sidewalk closure or blockage, at all times.
- Temporary pedestrian facilities shall be adjacent to the Project Site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- Sidewalk shall be kept open during construction until only when it is absolutely required to close or block sidewalk for construction and/or construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

CONDITION OF APPROVAL

Inadvertent discovery of tribal cultural resources

In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity), 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 Applicant shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 978-1290.
- If the City determines, pursuant to PRC Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 30 days, to conduct a site visit and make recommendations to the Applicant 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 Applicant shall implement the tribe's recommendations if a qualified archaeologist and by a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.
- The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
- If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.
- The Applicant 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 by a culturally affiliated tribal monitor and determined to be reasonable and appropriate.
- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

Inadvertent discovery of Human Remains

In the event that human skeletal remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any ground disturbance activities, the following procedures shall be followed:

- Stop immediately and contact the County Coroner:

1104 N. Mission Road

Los Angeles, CA 90033

(323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday), or

(323) 343-0714 (after hours, Saturday, Sunday, and holidays)

- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the NAHC.
- The NAHC will immediately notify the person it believes to be the most likely descendant (MLD) of the deceased Native American.
- The MLD has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the Applicant does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC.