



## The 640 S. San Vicente Blvd. Medical Clinics and Surgery Center Project

Case Numbers: CPC-2023-5444-GPA-ZC-HD; ENV-2023-5445-ND

**Project Location:** 640 S. San Vicente Boulevard, Los Angeles 90048

**Community Plan Area:** Wilshire

**Council District:** 5 - Young Yaroslavsky

**Project Description:** NEGATIVE DECLARATION (ENV-2023-5445-ND): 640 South San Vicente Blvd., 90048. The project proposes to change the use of the existing 68,500 square-foot, 5-story building from medical offices to medical clinics including a 9,996 square-foot surgery center. This change would include a General Plan Amendment, Zone Change, and Height District change to change the property's land use designation from Limited Commercial to Regional Center Commercial, and change the property's zone and height district from CR-1L-O and CR-1VL-O to (T)(Q)C2-2D-O to allow the proposed change of use and to legalize the existing building's nonconforming FAR. Construction consists of interior tenant improvements only. The attached parking garage structure will remain as-is and there is no new floor area to the existing building proposed as part of the requested entitlements.

**PREPARED FOR:**

The City of Los Angeles  
Department of City Planning

**PREPARED BY:**

EcoTierra Consulting, Inc.

**APPLICANT:**

Land of the Free LP

October 2025

# INITIAL STUDY

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# INITIAL STUDY

## 1 INTRODUCTION

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An application for the proposed 640 S. San Vicente Medical Building Project (“Project”) has been submitted to the City of Los Angeles 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), and the preparation of an Initial Study is required. This Initial Study and Negative Declaration (IS/ND) evaluates potential environmental effects resulting from implementation, and operation of the proposed Project. Based on the analysis provided within this IS/ND, the City has concluded that the Project would not result in significant impacts on the environment. This IS/ND is intended as an informational document and is ultimately required to be adopted by the decision makers prior to Project approval by the City.

### 1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act (CEQA) was enacted in 1970 with several basic purposes: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project’s approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study concludes that the Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report should be prepared; otherwise the Lead Agency may adopt a Negative Declaration or a Mitigated Negative Declaration.

This IS/ND has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document.

### 1.2 ORGANIZATION OF THE INITIAL STUDY

This IS/ND is organized into sections as follows:

#### 1 INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

## 2 EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the Project may have a significant effect on the environment.

## 3 PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including Project characteristics and a list of discretionary actions.

## 4 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

# INITIAL STUDY

## 2 EXECUTIVE SUMMARY

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**PROJECT TITLE** THE 640 S. SAN VICENTE MEDICAL BUILDING PROJECT

**ENVIRONMENTAL CASE NO.** ENV-2023-5445-EAF

**RELATED CASES** CPC-2023-5444-GPA-ZC-HD, ENV-2023-5445-EAF

**PROJECT LOCATION** 640 S. SAN VICENTE BOULEVARD  
LOS ANGELES 90048

**COMMUNITY PLAN AREA** WILSHIRE

**GENERAL PLAN DESIGNATION** LIMITED COMMERCIAL

**ZONING** CR-1L-O, CR-1VL-O

**COUNCIL DISTRICT** 5 – YOUNG YAROSLAVSKY

**LEAD CITY AGENCY** CITY OF LOS ANGELES DEPARTMENT OF CITY PLANNING

**STAFF CONTACT** RICARDO VAZQUEZ

**ADDRESS** 200 N SPRING STREET, ROOM 620  
LOS ANGELES, CALIFORNIA 90012

**PHONE NUMBER** (213) 978-1353

**EMAIL** RICARDO.VAZQUEZ@LACITY.ORG

**APPLICANT** JOSE NAVAR, LAND OF THE FREE LP

**ADDRESS** 640 S. SAN VICENTE BOULEVARD  
LOS ANGELES 90048

**PHONE NUMBER** (323) 782-8880

## PROJECT DESCRIPTION

The Project proposes to change the use of the existing 68,500 square-foot, 5-story building from medical offices to medical clinics including a 9,996 square-foot surgery center. This change would include a General Plan Amendment, Zone Change, and Height District change to change the property's land use designation from Limited Commercial to Regional Center Commercial, and change the property's zone and height district from CR-1L-O and CR-1VL-O to (T)(Q)C2-2D-O to allow the proposed change of use and to legalize the existing building's nonconforming FAR. Construction consists of interior tenant improvements only. The attached parking garage structure will remain as-is and there is no new floor area to the existing building proposed as part of the requested entitlements.

(For additional detail, see "**Section 3, PROJECT DESCRIPTION**").

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## ENVIRONMENTAL SETTING

The Project Site is currently developed with a 5-story building used as medical offices and is designated for Limited Commercial land use in the Wilshire Community Plan, with corresponding zones CR-1L-O (Limited Commercial – Height District 1L – Oil Drilling) and CR-1VL-O (Limited Commercial – Height District 1VL – Oil Drilling). Uses surrounding the Project Site include residences to the east and north, and commercial uses to the south and to the west across San Vicente Boulevard.

(For additional detail, see "**Section 3, PROJECT DESCRIPTION**").

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## OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

(e.g. permits, financing approval, or participation agreement)

- None

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Aesthetics                       | <input type="checkbox"/> Greenhouse Gas Emissions      | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation                         |
| <input type="checkbox"/> Air Quality                      | <input type="checkbox"/> Hydrology / Water Quality     | <input type="checkbox"/> Transportation                     |
| <input type="checkbox"/> Biological Resources             | <input type="checkbox"/> Land Use / Planning           | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Cultural Resources               | <input type="checkbox"/> Mineral Resources             | <input type="checkbox"/> Utilities / Service Systems        |
| <input type="checkbox"/> Energy                           | <input type="checkbox"/> Noise                         | <input type="checkbox"/> Wildfire                           |
| <input type="checkbox"/> Geology / Soils                  | <input type="checkbox"/> Population / Housing          | <input type="checkbox"/> Mandatory Findings of Significance |

## DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

*Ricardo Vazquez*

10/15/2025

**SIGNATURE**

**DATE**

Ricardo Vazquez

213-978-1353

**PRINTED NAME, TITLE**

**PHONE NUMBER**

## EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are "Less than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
  - a) The significance criteria or threshold, if any, used to evaluate each question; and
  - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

# INITIAL STUDY

## 3 PROJECT DESCRIPTION

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### 3.1 PROJECT SUMMARY

The Project proposes to change the use of the existing 5-story building from offices to medical clinics including a surgery center. This change would include a General Plan Amendment, Zone Change, and Height District change to change the property’s land use designation from Limited Commercial to Regional Center Commercial, and the property’s zone and height district from CR-1L-O and CR-1VL-O to (T)(Q)C2-D2-O to allow the proposed change of use. Construction consists of interior tenant improvements. There are no changes to the existing attached parking garage structure and no new floor area is proposed as part of the requested entitlements.

### 3.2 ENVIRONMENTAL SETTING

#### 3.2.1 Project Location

The Project Site is located at 640 S. San Vicente Boulevard in the Wilshire Community Plan area in the City of Los Angeles. The Project Site fronts San Vicente Boulevard on the west and is also bound by Orange Street to the south and an alleyway on the east. Regional access to the area of the Project Site is provided by Interstate 10 (I-10), approximately 2.7 miles to the south via La Cienega Boulevard. Local access to the Project Site is provided via San Vicente Boulevard and Wilshire Boulevard. The Project Site is located approximately 0.5-mile south of the La Cienega & San Vicente bus stop for Los Angeles County Metropolitan Transportation Authority (“Metro”) Line 105 and within approximately 0.3-mile from the forthcoming Wilshire & La Cienega station for the Metro Line D extension, scheduled to open in 2025. **Figure 3-1, Project Location Map**, at the end of **Section 3, Project Description**, shows the Project Site’s location.

#### 3.2.2 Existing Conditions

The approximately 29,395-square-foot (0.675-acre) Project Site consists of five lots associated with Assessor Parcel Number (APN) 5510-022-054. The Project Site is currently developed with a five-story office building and a four-story parking structure. The Project Site is entirely paved. There are five street trees within the public right-of-way along San Vicente and one street tree within the public right-of-way on Orange Street adjacent to the Project Site. See **Figure 3-2, Aerial View of Project Site**, at the end of **Section 3, Project Description**, for an aerial photo of the Project Site.

The Project Site is zoned CR-1L-O Limited Commercial – Height District 1L – Oil Drilling) and CR-1VL-O (Limited Commercial – Height District 1VL – Oil Drilling) and has a General Plan Land Use Category of Limited Commercial. The Project Site is located in a Tier 3 Transit Oriented Communities (TOC); in a T-2 Transit Oriented Incentive Area (TOIA) within the Mixed Income Incentive Program; eligible for AB 2097 based on distance within half mile of a Major Transit Stop; within half mile of a High Quality Transit Corridor; an Urban Agriculture Incentive Zone; and Transit Priority Area in the City of Los Angeles (ZI No. 2452).

### **3.2.3 Surrounding Land Uses**

The land uses within the general vicinity consist of commercial and office uses to the west across San Vicente Boulevard which is within the City of Beverly Hills jurisdiction, a rehabilitation center to the north across 6<sup>th</sup> Street, a commercial building to the south across Orange Street, and multi- and single-family residential uses to the east across the alley. Properties in the surrounding area to the north and south are designated Limited Commercial and Regional Commercial and zoned (T)(Q)C2-2D-O, respectively; properties in the surrounding area to the east are designated Low Medium I Residential and Medium Residential and zoned R2 and R3, respectively. The Project Site is within 3,500 feet of Cedars Sinai Medical Center. The Project Site is across the street from the approved 650 S San Vicente Blvd project which was approved for construction of a new 12-story, 145,305 square foot mixed-use commercial building with medical office, lab, ground floor retail or restaurant, and 4 stories of above grade parking.

## **3.3 DESCRIPTION OF PROJECT**

### **3.3.1 Project Overview**

As shown in **Figure 3-3, Site Plan**, at the end of **Section 3, Project Description**, the Project proposes to change the use of the existing 5-story building from medical offices to medical clinics including a surgery center. This change would include a General Plan Amendment, Zone Change, and Height District change to change the property's underlying land use designation from Limited Commercial to Regional Center Commercial and change the property's zone and height district from CR-1L-O and CR-1VL-O to (T)(Q)C2-2D-O to allow the change of use. Construction consists of interior tenant improvements. The existing 68,500-square-foot building would not change in size. No changes are proposed to the exterior or footprint of the existing building or parking structure. Vehicular access to the Project Site would continue to be via two driveways into the parking structure, one off of San Vicente Boulevard and one off of the alley. No changes are proposed to the existing hardscape or street trees.

### **3.3.2 Design and Architecture**

The existing 5-story medical office building and adjacent parking structure would remain with the same architecture and design. No changes are proposed to the exterior of the existing building or parking structure.

### **3.3.3 Anticipated Construction Schedule**

The Project's interior improvements would occur over approximately 24 months, tenant by tenant as turnover occurs in the building.

## **3.4 REQUESTED PERMITS AND APPROVALS**

The list below includes the anticipated requests for approval of the Project. The IS/ND will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. City departments, commissions, and councils that may use this IS/ND in their decision-making process include the Department of Building and Safety, the Planning Department, the Department of Public Works, the Planning Commission, and the City Council.

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

- (1) General Plan Amendment pursuant to LAMC Section 11.56 to change the property's land use designation from Limited Commercial to Regional Center Commercial;
- (2) Zone and Height District Change Pursuant to LAMC Section 12.32-F and 12.32-Q from CR-1L-O and CR-1VL-O to (T)(Q)C2-2D-O, in conjunction with a proposed change of use from 5 levels of medical offices to 5 levels of medical clinics and a surgery center in an existing building and to legalize the existing building's nonconforming FAR; and
- (3) Other discretionary and ministerial permits and approvals that may be deemed necessary, including but not limited to building permits in order to execute and implement the Project.



■ Project Site

Source: OpenStreetMap, December 2024.

Figure 3-1  
Project Location Map



■ Project Site

Source: Google Earth, November 2023.

Figure 3-2  
Aerial Photograph of the Project Site



# INITIAL STUDY

## 4 ENVIRONMENTAL IMPACT ANALYSIS

### I. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) Have a substantial adverse effect on a scenic vista?**

**No Impact.** A significant impact may occur if a project would have a substantial adverse effect on a scenic vista. A scenic vista refers to views of focal points or panoramic views of broader geographic areas that have visual interest. A focal point view would consist of a view of a notable object, building, or setting. An impact on a scenic vista would occur if the bulk or design of a building or development contrasts enough with a visually interesting view, so that the quality of the view is permanently affected.

The Project includes changes to the land use and zone designations of the site and interior improvements of an existing building. The Project does not include any exterior alterations to the existing building, which would remain on the site in its current size and design. As such, the Project would not have a substantial adverse effect on a scenic vista. Therefore, no impact would occur.

## Mitigation Measures

None required.

**b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

**No Impact.** A significant impact would occur if scenic resources within a State scenic highway would be damaged and/or removed by development of a project. The Project Site is not located within or adjacent to a state or county scenic highway;<sup>1</sup> therefore, there is not potential for its implementation to damage scenic resources within a state scenic highway. No impact would occur and no mitigation is required.

## Mitigation Measures

None required.

**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?**

**Less Than Significant Impact.** A significant impact may occur if, in a non-urbanized area, a project would substantially degrade the existing visual character or quality of the site and its surroundings, or if, in an urbanized area, a project would conflict with applicable zoning or regulations governing scenic quality. The Project Site is an urbanized area;<sup>2</sup> therefore, the applicable threshold with respect to the Project is consistency with applicable zoning and other regulations governing scenic quality.

## Zoning Consistency

The Project Site is located within the Wilshire Community Plan area and is designated as Limited Commercial with corresponding zones of C1, C1.5, C2, C4, P, CR, RAS3 and RAS4. The Project Site is currently zoned CR-1L-O (Limited Commercial – Height District 1L – Oil Drilling) and CR-1VL-O ( Limited Commercial – Height District 1VL – Oil Drilling). The Project proposes to change the General Plan Land Use Designation of the Project Site from Limited Commercial to Regional Commercial, and the zoning designation from CR-1L-O and CR-1VL-O to (T)(Q)C2-2D-O (Q Condition – Commercial – Height District 2D – Oil Drilling District), to permit a change of use from medical offices to medical clinics and a surgery center in the existing 5-story, 74 feet and 8 inches in height, 68,500 square foot medical office with an Floor Area Ratio (FAR) of approximately 2.3:1. The zone change would permit the existing building’s nonconforming FAR which is over 1.5:1, however, there are no additional floor area and exterior alterations proposed as part of the Project. The Project’s proposed General Plan Amendment, through the unmodified Footnote 6, makes the

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<sup>1</sup> California Department of Transportation, *California Scenic Highway System Map*, available at: <https://www.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>, accessed November 2024.

<sup>2</sup> California Code of Regulations, Title 14, Section 15387 defines “urbanized area” as a “central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile.”

Project Site subject to Height District 2. Generally, Height District 2 in the C zone allows unlimited height with an FAR of 6.0:1; however, a proposed “Q” Condition and “D” Limitation could limit the Project Site FAR to the existing FAR of approximately 2.3:1, which is currently nonconforming because it is over 1.5:1 FAR, and a maximum height of 74 feet and 8 inches. Other nearby commercial lots along Wilshire Boulevard have similar D limitations that set maximum height and FAR.

The proposed General Plan Amendment to Regional Commercial would be consistent with adjacent development patterns and the existing zoning of similarly situated commercial properties along Wilshire Boulevard and at the corners of Wilshire Boulevard and San Vicente Boulevard. The Project’s proposed General Plan Amendment and Zone Change would bring the existing building into conformance, and therefore the site would be more compliant with the zone and land use designation after approval of the Project. The Project does not include any physical exterior changes to the existing building.

### **Other Scenic Quality Regulations**

#### *Community Plan*

The Project Site is located within the boundaries of the Wilshire Community Plan. The Wilshire Community Plan (Community Plan) is one of the 35 community plans that makes up the Land Use Element of the City of Los Angeles’ General Plan. The Community Plan promotes an arrangement of land use, infrastructure, and services intended to enhance the economic, social, and physical health, safety, welfare, and convenience of the people who live, work, and invest in the community. The Community Plan includes goals, objectives, and policies related to residential development, some of which are related to scenic quality. The policies relevant to this analysis are the following:

- **Policy 2-1.1:** New commercial uses should be located in existing established commercial areas or shopping centers.
- **Policy 2-1.2:** Protect existing and planned commercially zoned areas especially in Regional Commercial Centers, from encroachment by standalone residential development by adhering to the community plan land use designations.
- **Objective 2-2:** Promote distinctive commercial districts and pedestrian-oriented areas.
- **Policy 2-2.1:** Encourage pedestrian-oriented design in designated areas and in new development.
- **Objective 2-3:** Enhance the visual appearance and appeal of commercial districts.
- **Policy 15-1.2:** Develop off-street parking resources, including parking structures and underground parking in accordance with design standards.

The Project would result in a new use of medical clinics and a surgery center in the existing building, with no change to the footprint, size, or exterior of the building or parking structure. The Project would maintain the exiting viewshed and aesthetic quality of the site. According to Los Angeles Building Permits 1953LA76532 and 1954LA77703 and Certificate of Occupancy 1954LA77703 the building at 640 San Vicente was built between 1953 and 1954 as a medical office building. The parking structure was constructed in 1984 according to Permit 1984LA90374

and Certificate of Occupancy 1984LA90374. In 2021, a Certificate of Occupancy was issued for several change of uses for individual suites inside the building, changing uses from Office to Medical Office, Theater to Medical Suite, Kitchen to Medical Office Suite, and Office to Residential Suite. The building historical building permits do not include any variances or exceptions, which demonstrate that the building and parking structure were considered conforming at the time of construction and permitting; the building is now considered “nonconforming” as the building was legally established under prior zoning regulations but no longer complies with current regulations. The Project’s proposed General Plan Amendment and Zone Change would bring the existing building into conformance, and therefore the site would be more compliant with the zone and land use designation after approval of the Project. The existing building would continue to be compatible in scale, character, design, and aesthetics, with the surrounding buildings. Thus, the Project would not detract from the visual character or quality of the site or surroundings.

### **Summary**

Based on the above, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, impacts would be less than significant and no mitigation measures would be required.

### **Mitigation Measures**

None required.

#### **d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

**No Impact.** A significant impact may occur if the development introduces new sources of light or glare on or from a project site which adversely affect day or nighttime views in the area.

The Project Site is located in an urban area of the City where there are ambient nighttime lighting sources including street lights, vehicle headlights, and architectural and security lighting, and indoor building illumination (light emanating from structures that passes through windows). The Project does not propose to add any new sources of light or glare, as the Project does not propose any changes to the existing five-story commercial building. The building would continue to provide lighting to illuminate entrances, walkways, and driveways and the building would continue to include indoor building illumination. The exterior of the existing building is not proposed to be changed under the Project and would continue to include both solid and glass (window) surfaces. As such, the Project would not create a new source of substantial glare that would adversely affect day or nighttime views in the area. Therefore, no impacts would occur and no mitigation measures would be required.

### **Mitigation Measures**

None required.

## II. AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**No Impact.** A significant impact may occur if a project were to result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use.

According to surveys conducted pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, the Site and surrounding area are considered Urban and Built Up Land and is not considered Prime Farmland, Unique Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and Grazing Land (Farmland).<sup>3</sup> Therefore, the Project

<sup>3</sup> State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, California Important Farmland Finder Interactive Map, available at: <https://maps.conservation.ca.gov/DLRP/CIFF/>, accessed November 2024.

would not convert existing Farmland to non-agricultural use. Accordingly, no impacts would occur and no mitigation measures would be required.

**Mitigation Measures**

None required.

**b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

**No Impact.** A significant impact may occur if a project were to conflict with land zoned for agricultural use or under a Williamson Act contract.

The Project Site is zoned CR-1L-O (Limited Commercial – Height District 1L – Oil Drilling) and CR-1VL-O (Limited Commercial – Height District 1VL – Oil Drilling). Thus, the Project Site is not zoned for agricultural use, nor are there any agricultural uses currently occurring at the Project Site or within the surrounding area. Additionally, the Project Site is not under a Williamson Act contract. Accordingly, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract. Therefore, no impacts would occur and no mitigation measures would be required.

**Mitigation Measures**

None required.

**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))?**

**No Impact.** A significant impact may occur if a project were to result in a conflict with land zoned for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned timberland production (as defined by Government Code section 51104(g)).

In the City of Los Angeles, forest land is a permitted use in areas zoned OS (Open Space). The Project Site is zoned CR-1L-O (Limited Commercial – Height District 1L – Oil Drilling) and CR-1VL-O (Limited Commercial – Height District 1VL – Oil Drilling) and no forest land exists on the Site. The City does not have specific zoning for timberland or timberland production; however, the Project Site is currently developed with a commercial office building and is not utilized for timberland or timberland production uses. Accordingly, the Project would not conflict with existing zoning for forest land or timberland or result in the rezoning of forest land, timberland, or timberland production. Therefore, no impacts would occur and no mitigation measures would be required.

**Mitigation Measures**

None required.

**d) Result in the loss of forest land or conversion of forest land to non-forest use?**

**No Impact.** A significant impact may occur if a project were to result in the loss of forest land or conversion of forest land to non-forest use.

The Project Site is currently developed with a commercial building used as offices, primarily medical offices. The surrounding vicinity is developed commercial, office, medical, and residential uses in an urban area of the City. Accordingly, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impacts would occur and no mitigation measures would be required.

**Mitigation Measures**

None required.

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

**No Impact.** A significant impact may occur if a project indirectly results in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

The Project Site is located in an urban area of the City and is currently developed with a commercial building used as offices, primarily medical offices. No agricultural uses, designated Farmland, or forest land uses occur at the Project Site or within the surrounding area. The Project proposes to change the use of the existing 5-story building from medical offices to medical clinics and a surgery center with interior tenant improvements. This change would include a General Plan Amendment, Zone Change, and Height District change to change the property's land use designation from Limited Commercial to Regional Center Commercial, and change the property's zone and height district from CR-1L-O and CR-1VL-O to (T)(Q)C2-2D-O to allow the proposed change of use and to legalize the existing building's nonconforming FAR. As such, implementation of the Project would not result in the conversion of existing Farmland, agricultural uses, or forest land on- or off-site. Therefore, no impacts would occur and no mitigation measures would be required.

**Mitigation Measures**

None required.

### III. AIR QUALITY

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

**a) Conflict with or obstruct implementation of the applicable air quality plan?**

**Less than Significant Impact.** The City, including the Project Site, is within the South Coast Air Basin (Basin), and the South Coast Air Quality Management District (SCAQMD) is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources to meet federal and State ambient air quality standards. The SCAQMD has responded to this requirement by preparing a series of air quality management plans (AQMPs). The most recent AQMP, the 2022 AQMP, identifies the control measures that will be implemented over a 20-year horizon to reduce major sources of pollutants. Control measures established in previous AQMPs have substantially decreased exposure to unhealthy levels of pollutants, even while substantial population growth has occurred within the Basin.

The 2022 AQMP control strategies were developed, in part, based on regional growth projections prepared by the Southern California Association of Governments (SCAG). Specifically, the 2022 AQMP forecasts the 2037 emissions inventories “with growth” based on SCAG’s 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS). As the AQMP control strategy is based on projections from local general plans, projects which are consistent with local general plans are considered to be consistent with the growth assumptions of the air-quality-related regional plans and their emissions are assumed to be accounted for in the AQMP emissions inventory. Projects which include amendments to general or specific plans, or are considered significant projects, undergo further scrutiny for AQMP consistency.

As detailed further in **Section XI, Land Use and Planning**, of this IS/ND, the Project would be consistent with the City of Los Angeles General Plan including the Wilshire Community Plan, the portion of the Land Use Element applicable to the Project Site. The Project proposes to change the use of the existing 5-story building from medical offices to medical clinics including a surgery center, which would not be considered a significant project pursuant to Title 14, Section 15206(b) of the California Code of Regulations, which establishes criteria for projects of statewide, regional,

or areawide significance.<sup>4</sup> Because the Project would not result in a significant change of the use on the Site from existing conditions, and the existing use would be brought into conformance with the General Plan through the Project, it is assumed that the Project's emissions have been accounted for in the 2022 AQMP. Therefore, the Project would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant and no mitigation measures would be required.

### **Mitigation Measures**

None required.

#### **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?**

**Less than Significant Impact.** A significant impact may occur if the project would add a considerable cumulative contribution to federal or State non-attainment pollutants.

Criteria pollutants include Ozone (O<sub>3</sub>), Carbon Monoxide (CO), Nitrogen Dioxide (NO<sub>2</sub>), Respirable Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>), Sulfur Oxides (SO<sub>x</sub>), and lead. Currently, the Basin is a nonattainment area for the federal standards for O<sub>3</sub> and PM<sub>2.5</sub> and the state standards for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>.<sup>5</sup> The Los Angeles County portion of the Basin is also designated nonattainment for the federal standard for lead. Sources of lead emissions are ore and metals processing (e.g., lead smelters, leaded aviation gasoline combustion), waste incinerators, lead-acid battery manufacturing, etc. The Project would not include any such sources of lead emissions.

The Project consists of a change of use, a General Plan Amendment, and a Zone Change. The building and parking structure currently on the Project Site would be interiorly modified to accommodate medical clinic uses and a surgery center. The building would continue to operate similar to existing conditions, as it is currently used as an office building with primarily medical offices. The proposed change in use and associated land use designation changes would not result in air quality emissions in excess of SCAQMD regional operational emissions thresholds. Interior tenant improvements that are limited to interior partitions, non-combustion HVAC upgrades, and surface finishes do not exceed SCAQMD screening criteria for CEQA analysis.<sup>6</sup> Interior tenant improvements will not include site disturbance, grading, or new exhaust systems and thus are not anticipated to include significant sources of criteria pollutants.

Therefore, the Project would not 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

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<sup>4</sup> See *Cal. Code of Regs. Tit. 14 Section 15206(b)*, available at: [https://govt.westlaw.com/calregs/Document/I8B6F4F6B5B4D11EC976B000D3A7C4BC3?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Document/I8B6F4F6B5B4D11EC976B000D3A7C4BC3?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)), accessed June 2025.

<sup>5</sup> *South Coast Air Quality Management District, National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Basin*, available at: <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf?sfvrsn=14>, accessed January 17, 2024.

<sup>6</sup> *South Coast Air Quality Management District, Form 400-CEQA, California Environmental Quality Act (CEQA) Applicability*.

ambient air quality standard. Impacts would be less than significant and no mitigation measures would be required.

### **Mitigation Measures**

None required.

#### **c) Expose sensitive receptors to substantial pollutant concentrations?**

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

Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes or others who engage in frequent exercise. SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, childcare centers, and athletic facilities.

As discussed above, due to the nature of the Project, the Project would not generate substantial concentrations of pollutants. The Project would continue to be required to adhere to existing SCAQMD rules and LAMC requirements designed to limit air quality emissions and prevent exceedances of air quality standards, as is the existing building. Furthermore, the Project would not include stationary sources or attract mobile sources (such as heavy duty trucks) that would spend long periods queuing or idling at the Site (e.g., industrial warehouses or transfer facilities).

Based on the above, the Project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, impacts would be less than significant and no mitigation measures would be required.

### **Mitigation Measures**

None required.

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

**Less than Significant Impact.** A significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors.

Odors are typically associated with the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. According to the SCAQMD *CEQA Air Quality Handbook*, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.

The Project would involve the change of use for the existing building from office to medical clinic, which are not typically associated with odor complaints. As the Project involves no operational elements related to industrial projects, no long-term operational objectionable odors are anticipated. Therefore, potential impacts associated with objectionable odors would be less than significant and no mitigation would be required.

**Mitigation Measures**

None required.

**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 Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**No Impact.** The Project Site is currently developed with a five-story office building and a four-story parking structure. The Project Site is entirely paved. There are five street trees within the public right-of-way along San Vicente and one street tree within the public right-of-way on Orange Street adjacent to the Project Site. The Project does not propose any changes to the existing building or parking structures, or the existing paving, and the existing street trees are not proposed to be removed or altered. Accordingly, implementation of the Project would not have the potential to result in an adverse effect on candidate, sensitive, or special status plant species. Therefore, the Project would not have the potential to result in an adverse effect on candidate, sensitive, or special status plant species.

No impacts would occur and no mitigation would be required.

#### **Mitigation Measures**

None required.

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

**No Impact.** The Project Site is currently developed with a five-story office building and a four-story parking structure. The Project Site is entirely paved. There are no riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area.<sup>7</sup> The Project does not propose any changes to the existing building or parking structures, or the existing paving, and the existing street trees are not proposed to be removed or altered. Therefore, implementation of the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impacts would occur and no mitigation would be required.

#### **Mitigation Measures**

None required.

- 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?**

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

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<sup>7</sup> *United States Fish and Wildlife Service, National Wetlands Inventory, <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>, accessed November 2024.*

No wetlands, including marshes, vernal pools, or coastal areas are located on or in the vicinity of the Project Site.<sup>8</sup> As such, the Project would not have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. No impacts would occur and no mitigation would be required.

#### **Mitigation Measures**

None required.

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

**No Impact.** A significant impact would occur if the Project would interfere with, or remove access to, a migratory wildlife corridor or impede use of native wildlife nursery sites.

The Project Site is not located within or adjacent to a Regional Wildlife Linkage, Essential Connectivity Area, or other formally recognized wildlife movement corridor. The Project Site and vicinity do not serve as a movement corridor. Additionally, there are no waterways in the surrounding vicinity that could be utilized by migratory fish. Furthermore, the Project does not propose new construction or any changes to the existing building or parking structures, or the existing paving, and the existing street trees are not proposed to be removed or altered. Accordingly, the Project would not fragment existing natural lands as it pertains to wildlife movement. As such, the Project would not interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impeded the use of native wildlife nursery sites. No impacts would occur and no mitigation would be required.

#### **Mitigation Measures**

None required.

**e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?**

**No Impact.** A significant impact could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance No. 186,873. The City of Los Angeles Protected Tree and Shrub Ordinance (Ordinance 186,873, LAMC Chapter IV, Article 6) regulates the relocation or removal of all protected trees or shrubs. In addition, a Bureau of Street Trees, Urban Forestry Division permit is required to plant, remove, destroy, cut, prune, or deface any tree, shrub, or plant in any street in the City.

There are five street trees within the public right-of-way along San Vicente and one street tree within the public right-of-way on Orange Street adjacent to the Project Site. The existing street trees are not proposed to be removed or altered as part of the Project. Additionally, according to the City of Los Angeles Tree Disclosure Statement signed by Project Site owner Jose Nazar on

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<sup>8</sup> *United States Fish and Wildlife Service, National Wetlands Inventory, <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>, accessed November 2024.*

April 4, 2024, there are no protected or significant trees on the property. Thus, the Project would not conflict with any local policies or ordinances protecting biological resources, including protected species. No impacts would occur and no mitigation would be required.

**Mitigation Measures**

None required.

**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?**

**No Impact.** A significant impact would occur if a project would be inconsistent with mapping or policies in any conservation plans of the types cited.

The Project Site is not located within the boundaries of a Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.<sup>9,10</sup> Accordingly, the Project would not conflict with such plans. No impacts would occur and no mitigation would be required.

**Mitigation Measures**

None required.

**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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>9</sup> California Department of Fish and Wildlife, California Natural Community Conservation Plans Map, August 2023, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed November 2024.

<sup>10</sup> City of Los Angeles Department of City Planning, Zone Information & Map Access System, available at: <http://zimas.lacity.org>, accessed November 2024.

**a) Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines §15064.5?**

**No Impact.** Section 15064.5 of the State CEQA Guidelines defines an historical resources as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register. The local register of historical resources is managed by the Los Angeles Office of Historic Resources, which operates SurveyLA, a comprehensive program to identify significant historical resources throughout the City.

The Project Site is currently developed with a five-story office building and a four-story parking structure; the Project Site has not been designated or identified as eligible or potentially eligible for designation as an historic resource, including as an Historic-Cultural Monument.<sup>11</sup> The Project Site is also not located within an Historic Preservation Overlay Zone.<sup>12</sup> The Project Site is located adjacent to the 6<sup>th</sup> Street-Orange Street Multi-Family Residential Historic District and 6617 W. Orange Street, both of which are historical resources for the purposes of CEQA. The Project does not propose any physical changes to the existing on-site conditions, and will not change the existing developed buildings. Helix Environmental Planning prepared an *Analysis of the Indirect Impacts of the 640 S. San Vicente Boulevard Project, City and County of Los Angeles, California* to evaluate the potential for the Project to impact the adjacent historical resources.<sup>13</sup> The analysis finds that the Project would comply with *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* Standard No. 9, which addresses potential indirect impacts to the spatial relationships of a historical resource and its component features. The Project is compatible with the two historical resources in that the existing scale would remain and therefore there would be no change in the spatial relationships within and between the historical resources and the Project Site. Accordingly, the Project would not cause a substantial adverse change in the significance of an historical resource, including those adjacent to the site. Therefore, no impacts to historical resources would occur and no mitigation measures would be required.

**Mitigation Measures**

None required.

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<sup>11</sup> City of Los Angeles Department of City Planning, Office of Historic Resources, *Historic Places LA online map*, available at: <http://www.historicplacesla.org/map>, accessed November 2024.

<sup>12</sup> City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed November 2024.

<sup>13</sup> Helix Environmental Planning, *Analysis of the Indirect Impacts of the 640 S. San Vicente Boulevard Project, City and County of Los Angeles, California*, June 13, 2024.

**b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?**

**No Impact.** Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which meet the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources.

Based on a review of City of Los Angeles Prehistoric and Historic Archaeological Sites and Survey Areas Map, the Project Site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas.<sup>14</sup> Furthermore, the Project does not propose any changes to the existing building or parking structures, or the existing paving. The Project does not propose any digging or construction activities that could uncover any previously undisturbed archaeological resources. Thus, the Project would not cause a substantial adverse change in the significance of an archaeological resource. Therefore, no impacts would occur and no mitigation measures would be required.

**Mitigation Measures**

None required.

**c) Disturb any human remains, including those interred outside of dedicated cemeteries?**

**No Impact.** A significant adverse impact could occur if grading or excavation activities associated with a project were to disturb previously interred human remains. It is unknown whether human remains are located at the Project Site.

No formal cemeteries, other places of human internment, or burial grounds sites are known to occur within the immediate Project Site area. Furthermore, the Project does not propose any excavation or construction activities that could uncover any human remains. Therefore, no impacts would occur and no mitigation measures would be required.

**Mitigation Measures**

None required.

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<sup>14</sup> City of Los Angeles, *Citywide General Plan Framework Final Environmental Impact Report*, certified August 2001, Figure CR-1 – Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, page 2.15-3.

## 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

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

The Project does not include construction, but would include interior tenant improvements over time to remodel interior spaces into medical clinics and a surgery center. The use of electricity associated with interior building improvements would be temporary and would fluctuate according to the phase of construction. It is anticipated that most of the electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which would result in minimal electricity usage during building improvement activities. As such, the Project would not involve the inefficient, wasteful, and unnecessary use of energy during the tenant improvement phase(s) of the Project.

Operation of the building both under existing conditions and after implementation of the Project would require energy consumption. All Project systems, including, but not limited to, HVAC, refrigeration, water heating, lighting, and the use of electronics, equipment, and appliances would be powered by electricity provided by the Los Angeles Department of Water and Power (LADWP), or natural gas which would be provided to the Project Site by Southern California Gas Company (SoCalGas). There are no unusual features of the Project or the Site that would result in the change of use of the building from medical office to medical clinic use representing more than a negligible portion of the electrical and natural gas consumption anticipated and planned for within the LADWP and SoCalGas service areas.

Depending on the extent of building upgrades that occur with each tenant improvement, the Project may be required to comply with the standards set in the California Building Code (CBC) Title 24 and Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC). The standards are updated every three years and each iteration is more energy efficient than the previous standards. The City's Green Building Code further establishes mandatory measures related to heat island effect reduction, ENERGY STAR compliant equipment, and HVAC system size and design, which exceed statewide Title 24 requirements. Furthermore, the Project would continue to reduce its use of nonrenewable energy resources as the electricity generated by renewable

resources provided by SCE continues to increase to comply with state requirements through Senate Bill 100 (SB 100), which requires electricity providers to increase procurement from eligible renewable energy resources to 60 percent by 2030 and 100 percent by 2045. The Project's proposed interior changes would thus likely make the building more energy efficient over time, and would not result in the wasteful, inefficient, or unnecessary consumption of energy during construction or operation. Impacts would be less than significant and no mitigation measures would be required.

### **Mitigation Measures**

None required.

### **b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

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

State regulations for energy efficiency are contained within California's Building Energy Efficiency Standards and CALGreen, both of which are set forth in California Code of Regulations (CCR) Title 24. California's Building Energy Efficiency Standards were established in 1978 and serve to enhance and regulate California's building standards. These standards include regulations for residential and non-residential buildings constructed in California to reduce energy demand and consumption. The Building Energy Efficiency Standards are updated every three years to incorporate and consider new energy efficiency technologies and methodologies.

As discussed above, the Project would implement features and systems designed to reduce the consumption of energy as the building is improved over time with new clinic uses and tenants. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant and no mitigation measures would be required.

### **Mitigation Measures**

None required.

## 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 substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

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

The Project Site is not located within a designated Alquist-Priolo Earthquake Fault Zone or within a Preliminary Fault Rupture Zone.<sup>15</sup> There are several Alquist-Priolo Earthquake Fault Zones in the Los Angeles region; the nearest Alquist-Priolo Earthquake Fault Zone to the Project Site is located approximately 2.74 miles southwest of the Project Site and is associated with the Newport-Inglewood Fault.<sup>16</sup> Because no known faults cross the property, the potential for ground rupture at the Project Site is considered remote.

The Project would involve a change of use to the existing building and would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth's crust or otherwise have the potential to directly or indirectly exacerbate existing potential for fault rupture. As such, the Project would not cause substantial adverse effects involving rupture of a known fault. Therefore, impacts would be less than significant and no mitigation measures would be required.

### **Mitigation Measures**

None required.

#### **ii. Strong seismic ground shaking?**

**Less than Significant Impact.** A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region.

The Project Site is located in the seismically active region of Southern California, and therefore, is susceptible to ground shaking during a seismic event. There are numerous active faults in the

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

<sup>16</sup> *California Department of Conservation, California Earthquake Hazards Zone Application map, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed December 19, 2023.*

region; as discussed above, the nearest active fault with a surface trace is the Newport-Inglewood Fault, approximately 2.74 miles southwest of the Project Site.

The Project would involve a change of use to the existing building and does not include new building construction. The existing building was constructed in 1985. Modern buildings are designed to resist ground shaking through the use of shear panels, moment frames, and reinforcement. The potential seismic shaking hazard to the Project Site would not be higher than in most areas of the City or elsewhere in the region. The Project would result in an on-going use of an existing building and would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth's crust or otherwise have the potential to directly or indirectly exacerbate existing potential for strong seismic ground shaking. As such, the Project would not cause substantial adverse effects involving seismic ground shaking. Therefore, impacts would be less than significant and no mitigation measures would be required.

### **Mitigation Measures**

None required.

### **iii. Seismic-related ground failure, including liquefaction?**

**Less than Significant Impact.** A significant impact may occur if a project is located in an area identified as having a high risk of liquefaction and mitigation measures required within such designated areas are not incorporated into the project. Liquefaction describes a phenomenon where cyclic stresses, which are produced by earthquake-induced ground motions, create excess pore pressures in cohesionless soils. As a result, the soils may acquire a high degree of mobility, which can lead to lateral spreading, consolidation and settlement of loose sediments, ground oscillation, flow failure, loss of bearing strength, ground fissuring, and sand boils, and other damaging deformations. This phenomenon occurs only below the water table, but after liquefaction has developed, it can propagate upward into overlying, non-saturated soils as excess pore water escapes. The possibility of liquefaction occurring at a given site is dependent upon the occurrence of a significant earthquake in the vicinity, sufficient groundwater to cause high pore pressures, and on the grain size, relative density, and confining pressures of the soil at the Site.

The Project Site is mapped within an area where historic occurrences of liquefaction or geological, geotechnical, and groundwater conditions indicate a potential for liquefaction to occur according to the California Geological Survey.<sup>17</sup> The Project would involve a change of use to the existing building and does not include new building construction. The Project would result in an on-going use of an existing building and therefore would not create any new conditions that could cause substantial adverse effects involving seismic-related ground failure. Therefore, impacts would be less than significant and no mitigation measures would be required.

### **Mitigation Measures**

None required.

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<sup>17</sup> California Department of Conservation, Open Data and Maps CNRA, CGS Seismic Hazards Program: Liquefaction Zones, website: <https://maps-cnra-cadoc.opendata.arcgis.com/datasets/cadoc::cgs-seismic-hazards-program-liquefaction-zones/explore?location=34.065548%2C-118.372465%2C18.72>, accessed December 2024.

#### iv. Landslides?

**No Impact.** A significant adverse effect may occur if a project is located in a hillside area with soil conditions that would suggest high potential for sliding. Landslides generally occur in loosely consolidated, wet soil and/or rock on steep sloping terrain. The Project Site is located on a flat site in a relatively flat location and is not located near significant hillsides. The Project Site is not mapped as potentially susceptible to seismically-induced landslides,<sup>18</sup> and no active or dormant landslides, including debris flows or rock slides, are known to exist on or adjacent to the Site.<sup>19</sup> The Project would involve a change of use to the existing building and does not include new building construction. The Project would result in an on-going use of an existing building and therefore would not create any new conditions that could cause substantial adverse effects involving landslides. Therefore, impacts would be less than significant and no mitigation measures would be required.

#### Mitigation Measures

None required.

#### b) Result in substantial soil erosion or the loss of topsoil?

**No Impact.** A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time.

The Project Site is currently developed with a five-story office building and a four-story parking structure; the Project Site is entirely paved. The Project does not include any demolition or new construction on the Project Site, and no grading is proposed. No changes are proposed to the existing hardscape or street trees. As such, the Project would not result in soil erosion or the loss of topsoil and no mitigation would be required.

#### Mitigation Measures

None required.

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

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

As detailed above, the Project would not result in landslide or liquefaction impacts. Because lateral spreading is the lateral movement of soils that have undergone liquefaction, the Project would, accordingly, not result in lateral spreading. Subsidence and ground collapse generally occur in areas with active groundwater withdrawal or petroleum production. The extraction of groundwater or petroleum from sedimentary source rocks can cause the permanent collapse of

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<sup>18</sup> California Department of Conservation, California Earthquake Hazards Zone Application map, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed December 2024.

<sup>19</sup> California Department of Conservation, California Geological Survey, Landslide Inventory Map, available at: <https://maps.conservation.ca.gov/cgs/lsl/>, accessed December 2024.

the pore space previously occupied by the removed fluid. Although the Project Site is within an identified oil drilling district<sup>20</sup>, there are no oil drilling activities on the Project Site and the Project itself does not propose oil drilling or any other direct withdrawal or injection of fluid into the subsurface soils beneath the Site. Furthermore, the Project does not include any excavation, demolition or new construction on the Project Site. As such, the Project would not exacerbate existing conditions such as unstable geologic units or unstable soil. Therefore, impacts would be less than significant and no mitigation measures would be required.

### **Mitigation Measures**

None required.

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

**Less than Significant Impact.** A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. Expansion and contraction of volume can occur when expansive soils undergo alternating cycles of wetting (swelling) and drying (shrinking). During these cycles, the volume of the soil changes markedly, and can cause structural damage to buildings and infrastructure.

As discussed above, the Project Site is currently developed with a five-story office building and a four-story parking structure; the Project Site is entirely paved. The Project does not include any demolition or new construction on the Project Site. The Project does not propose any structural or geological changes to the Project Site, which would ensure that the Project would not create substantial direct or indirect risks to life or property as a result of expansive soils. Therefore, impacts would be less than significant and no mitigation measures would be necessary.

### **Mitigation Measures**

None required.

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

**No Impact.** A significant impact may occur if a project is located in an area not served by an existing sewer system.

The Project would connect to the existing wastewater system. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impacts would occur and no mitigation measures would be required.

### **Mitigation Measures**

None required.

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<sup>20</sup> City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, available at: <http://zimas.lacity.org>.

**f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**No Impact.** A significant impact may occur if a project directly or indirectly destroys a unique paleontological resource or site or unique geologic feature.

No known paleontological resources are mapped by the City as within the Project Site.<sup>21</sup> Furthermore, the Project does not propose any changes to the existing building or parking structures, or the existing paving. The Project does not propose any digging or construction activities that could uncover any previously undisturbed paleontological resources. As such, the Project would not destroy a unique paleontological resource or site or unique geologic feature. No impact would occur and no mitigation measures would be required.

**Mitigation Measures**

None required.

**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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

**Less than Significant Impact.** A project may have a significant impact if project-related emissions would exceed federal, State, or regional standards or thresholds. Greenhouse gases (GHG) are those gaseous constituents of the atmosphere, both natural and human generated, that absorb and emit radiation at specific wavelengths within the spectrum of terrestrial radiation emitted by the earth’s surface, the atmosphere itself, and by clouds. The City has adopted the LA Green Plan to provide a citywide plan for achieving the City’s GHG emissions targets, for both existing and future generation of GHG emissions. In order to implement the goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current LAGBC (Ordinance No. 181,480). The LAGBC requires projects to achieve a 20 percent reduction in potable water use and wastewater

<sup>21</sup> City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-2 – Vertebrate Paleontological Resources in the City of Los Angeles, page 2.15-4.

generation. Through required implementation of the LAGBC, the proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs.

The Project proposes to change the use of the existing 5-story building from medical offices to medical clinics including a surgery center. This change would include a General Plan Amendment, Zone Change, and Height District change to change the property's land use designation from Limited Commercial to Regional Center Commercial, and change the property's zone and height district from CR-1L-O, and CR-1VL-O to (T)(Q)C2-2D-O to allow the proposed change of use and to legalize the existing building's nonconforming FAR. Construction consists of interior tenant improvements only and there is no new proposed addition/no new floor area in conjunction with the requested entitlements. There are no changes to the existing attached parking garage. The existing building would continue to operate as a medical building which would have daily visits by employees and visitors. As the Project does not propose an increase to the floor area of the existing building, the capacity of the building would not change and the number of daily visitors is not expected to change in any notable manner. Thus, the Project would not result in a change from existing conditions with respect to generation of GHG emissions. Therefore, the Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, and impacts with respect to GHGs would be less than significant. No mitigation measures would be required.

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

**Less than Significant Impact.** A significant GHG impact may occur if a project is not consistent with the AB32 Scoping Plan or other applicable plans designed to reduce greenhouse gas emissions such as a Climate Action Plan, or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of such a plan.

As discussed above, the Project proposes to change the use of the existing 5-story building from medical offices to medical clinics including a surgery center. The Project's proposed General Plan Amendment and Zone Change would allow the proposed change of use and to legalize the existing building's nonconforming FAR, and therefore the site would be more compliant with the zone and land use designation after approval of the Project. The existing building would continue to operate as a medical building which would have daily visits by employees and visitors. The Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. No mitigation measures would be required.

**Mitigation Measures**

None required.

## 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

**Less than Significant Impact.** A significant impact may occur if a project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors.

Medical waste includes, but is not limited to: sharps, biohazardous and pharmaceutical waste, all of which is subject to Chapter 4 of the Medical Waste Management Act (MWMA), Health and Safety Code (HSC) sections 117915 through 117946. The MWMA does not differentiate medical

waste by type of medical facility, and thus the regulations, standards, and guidelines for the use and disposal of medical waste associated with operations of the building as a medical clinic and surgery center would not be different from the regulations, standards, and guidelines applicable to existing operations within the building as medical offices. Use of these materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, state, and local agencies related to storage, use, and disposal of hazardous materials. Medical waste generated would continue to be managed in accordance with a Medical Waste Management Plan in compliance with California Department of Public Health standards. Medical waste would continue to be transported offsite by a licensed transporter for appropriate disposal on a regular basis.

Based on the above, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during construction or operation. Therefore, impacts would be less than significant and no mitigation measures would be required.

### **Mitigation Measures**

None required.

### **b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

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

As discussed above, medical waste includes, but is not limited to: sharps, biohazardous and pharmaceutical waste, all of which is subject to Chapter 4 of the MWMA, HSC sections 117915 through 117946. The MWMA does not differentiate medical waste by type of medical facility, and thus the regulations, standards, and guidelines for the use and disposal of medical waste associated with operations of the building as a medical clinic and surgery center would not be different from the regulations, standards, and guidelines applicable to existing operations within the building as medical offices. Medical waste would continue to be managed in accordance with a Medical Waste Management Plan in compliance with California Department of Public Health standards and transported offsite by a licensed transporter for appropriate disposal on a regular basis.

Based on the above, the Project would not 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. Therefore, impacts would be less than significant and no mitigation measures would be required.

### **Mitigation Measures**

None required.

**c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

**No Impact.** A significant adverse effect may occur if a project site is located within one-quarter mile of an existing or proposed school site and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds.

There are no schools located within 0.25-mile of the Project Site. The nearest school to the Site is Horace Mann Elementary School (8701 Charleville Boulevard), , located approximately one (1) mile to the west. As such, the Project would not emit or handle hazardous materials, substances, or waste within 0.25-mile of a school. Therefore, no impacts would occur and no mitigation measures would be required.

**Mitigation Measures**

None required.

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

**No Impact.** California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis.

The Project Site is not listed on any government database of hazardous materials sites.<sup>22</sup> As such, the Project would not create a significant hazard to the public or environment related as a result of the Site's inclusion on such lists. Therefore, no impact would occur and no mitigation measures would be required.

**Mitigation Measures**

None required.

**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.** A significant impact may occur if a project is located within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard.

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<sup>22</sup> California Environmental Protection Agency, Cortese List Data Resources, <https://calepa.ca.gov/SiteCleanup/CorteseList/>, accessed December 2024.

The Project Site is not located within any airport's influence area nor within two miles of an existing airport.<sup>23</sup> The nearest airport is the Santa Monica Airport (3233 Donald Douglas Loop S, Santa Monica), located approximately 5.37 miles to the southwest. Therefore, the Project would not result in a safety hazard or excessive noise for people living in the Project area as a result of airports. No impact would occur and no mitigation measures would be required.

### **Mitigation Measures**

None required.

#### **f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**Less than Significant Impact.** A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. The Emergency Management Department (EMD) leads the City's effort in the development of citywide emergency plans, revises and distributes the Emergency Operations Master Plan and Master Procedures and Annexes and updates and disseminates guidelines for the emergency response plans.

The Project does not include any proposed changes to the existing circulation system on or around the Project Site, and does not include any new buildings on the site or exterior features. The Project does not include alterations to vehicular circulation routes or patterns, and would not impede public access or travel upon public rights-of-way and would not include the installation of barriers (e.g. perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site. Although evacuation routes and shelters are determined during an emergency based on availability and current conditions, in the event of an emergency evacuation of the Project area, there are several pre-designated disaster routes in the greater Project area including Wilshire Boulevard and La Cienega Boulevard.<sup>24</sup> The Project would introduce additional traffic onto these disaster routes during an emergency evacuation; however, this would be the same scenario as under existing conditions and thus the Project would not represent an increase that would not be expected to result in substantial delays or capacity exceedances during an emergency. Emergency access to the Project Site and surrounding uses would be maintained at all times.

Based on the above, the Project would not Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant and no mitigation would be required.

### **Mitigation Measures**

None required.

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<sup>23</sup> County of Los Angeles, Department of Regional Planning, *Airports and Airport Influence Areas*, August 2018, [https://case.planning.lacounty.gov/assets/upl/project/ALUC\\_Airports\\_Aug2018\\_rev3.pdf](https://case.planning.lacounty.gov/assets/upl/project/ALUC_Airports_Aug2018_rev3.pdf), accessed December 19, 2024.

<sup>24</sup> County of Los Angeles, Department of Public Works, *Disaster Route Map: City of Los Angeles, Central Area*, August 13, 2008, available at <https://pw.lacounty.gov/dsg/DisasterRoutes/map/Los%20Angeles%20Central%20Area.pdf>, accessed December 2024.

**g) 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 poses a potential fire hazard, which could expose persons or structures, either directly or indirectly, in the area in the event of a fire.

The Project Site is not located within a Very High Fire Hazard Severity Zone.<sup>25</sup> The Project Site is located in a developed, urban area in the City of Los Angeles. The Project Site and surrounding area are relatively flat and do not contain any significant slope. Accordingly, the Project would not directly or indirectly expose people or structures to significant risk of loss involving wildland fires. Therefore, impacts would be less than significant and no mitigation measures would be required.

**Mitigation Measures**

None required.

**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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>25</sup> City of Los Angeles Department of City Planning, Zone Information & Map Access System, available at: <http://zimas.lacity.org>.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) 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 which does not meet the quality standards of agencies which regulate surface water quality and water discharge into storm water drainage systems. Significant impacts may also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

The Project Site lies within the jurisdiction of the Los Angeles Regional Water Quality Control Board (“RWQCB”). The Project does not include construction activities (no grading or building construction) and therefore is not required to comply with the state’s General Construction National Pollutant Discharge Elimination System (NPDES) Permit or the development of a construction Stormwater Pollution Prevention Plan.

Stormwater runoff from the Project Site currently has the potential to introduce small amounts of pollutants into the stormwater system. Possible pollutants include runoff from landscaped areas (pesticides and fertilizers) and paved surfaces (oil/grease, household cleaners, and trash). The Project does not propose any changes to the existing paving or hardscape, or the stormdrain system on or around the Site, and thus would continue to be subject to the NPDES standards and the City’s Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176) which prohibit the discharging of any pollutants or hazardous materials to the stormdrain system or receiving waters.

The Project does not propose any activities that would violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality during construction or operation. Therefore, impacts would be less than significant and no mitigation measures would be required.

## **Mitigation Measures**

None required.

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

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

Operation of the Project would continue to use a municipal water supply, as under existing conditions, and does not propose the use of any wells or other means of extracting groundwater. Potable water will be supplied by the LADWP, which draws water supplies from distant sources and which conducts its own assessments and mitigation of potential environmental impacts. The Project does not include any excavation and thus groundwater at the Project Site will not be directly encountered or affected. The Project would not change the amount of pervious or impervious area at the Site. As such, the Project would not decrease groundwater supplies or substantially interfere with groundwater recharge. Therefore, impacts would be less than significant and no mitigation measures would be required.

## **Mitigation Measures**

None required.

- 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; or**
  - 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.**
  - iv. Impede or redirect flood flows?**

**No Impact.** A significant impact may occur if a project: results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the project; results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the Project Site or nearby properties; would increase the volume of storm water runoff to a level which exceeded the capacity of the storm drain system serving a project site or substantially increase the probability that polluted runoff would reach the storm drain system; or results in a substantial alteration of flood flows.

As discussed above, the Project does not include construction activities (no grading or building construction) and thus there are no proposed construction activities could have the potential to alter existing drainage patterns or flows on the Project Site. The Project would not result in erosion or siltation, on- or off-site flooding, or polluted runoff as a result of construction activities.

The Project does not propose any changes to the existing paving or hardscape, or to the stormdrain system on or around the Site. As such, the Project would not alter the existing drainage pattern of the Project Site in a manner that would result in erosion, flooding, exceedance of storm drainage systems, or provide sources of polluted runoff.

According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map, the Project Site is within Zone X, which is a designation for areas of minimal flood hazard,<sup>26</sup> and the City identifies the Project Site outside of a flood zone.<sup>27</sup> In addition, no streams or rivers that may overflow or breach a levee are located on or near the Project Site. The Site is not located within a tsunami hazard area or potential inundation area of a dam or flood control basin.<sup>28</sup> As such, the Project would not be expected to encounter flood flows.

Based on the above discussion, no impacts would occur and no mitigation measures would be required.

### **Mitigation Measures**

None required.

#### **d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

**Less than Significant Impact.** A significant impact may occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (seiche and tsunami) or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows.

As detailed above, the Project Site is not located within a flood hazard, tsunami, or seiche zone. Furthermore, as discussed in greater detail in **Checklist Section IX, Hazards and Hazardous Materials**, typical hazardous materials utilized by medical facilities (e.g., mercury, pharmaceuticals, radiologicals, sterilants and disinfectants, cleaning solvents, laboratory chemicals, and pesticides for landscaping) would be properly stored and handled as to avoid spilling contents in an area that may encounter flood water. As such, the Project would not risk release of pollutants due to inundation. Therefore, impacts would be less than significant and no mitigation measures would be required.

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<sup>26</sup> Federal Emergency Management Agency, *Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1629F, effective September 26, 2008, website: <https://msc.fema.gov/portal/search>, accessed December 2024.*

<sup>27</sup> City of Los Angeles Department of City Planning, *Zone Information & Map Access System, website: <http://zimas.lacity.org>.*

<sup>28</sup> City of Los Angeles Department of City Planning, *Safety Element of the City of Los Angeles General Plan, Exhibit G: Inundation and Tsunami Hazard Areas, adopted November 26, 1996.*

## Mitigation Measures

None required.

### e) **Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

**Less than Significant Impact.** A significant water quality impact may occur if a project is not consistent with water quality control plans or sustainable groundwater management plans. Water quality control plans applicable to the Project Site include the Los Angeles Regional Water Quality Control Board's (LARWQCB) *Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan) and the City's *Water Quality Compliance Master Plan for Urban Runoff* (Master Plan). Adopted by LARWQCB, the Basin Plan designates beneficial uses for surface and groundwaters, sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's anti-degradation policy, and describes implementation programs to protect all waters in the Los Angeles Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. The Master Plan was developed by the Bureau of Sanitation, Watershed Protection Division in collaboration with stakeholders with the primary goal of the Master Plan is to help meet water quality regulations. The Master Plan identifies and describes the various watersheds in the City, summarizes the water quality conditions of the City's waters, identifies known sources of pollutants, describes the governing regulations for water quality, describes the BMPs that are being implemented by the City, discusses existing Total Maximum Daily Loads (TMDL)<sup>29</sup> Implementation Plans and Watershed Management Plans.

As previously discussed, the Project does not propose any construction activities that would encounter groundwater or spread contaminants into surface water. Furthermore, while the change of use of the building from medical office to medical clinic and surgery center could slightly increase the use of onsite hazardous materials, compliance with all applicable existing regulations at the Project Site regarding the handling, storage, and potentially required cleanup of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated. In addition, operation of the Project would not require direct groundwater extraction either through permanent dewatering or for water supply use.

The Project does not propose direct groundwater withdraw for any purpose including supply or dewatering. The Project would continue to receive its water from the LADWP, who receives approximately eight percent of its total water supply from groundwater.<sup>30</sup> Locally, the City holds water rights in the San Fernando, Sylmar, Eagle Rock, Central, and West Coast Basins, all of which have been adjudicated by California courts and are governed by judicial decrees, including the Upper Los Angeles River Area (ULARA) Groundwater Basin Adjudication, which encompasses the San Fernando, Sylmar, Verdugo, and Eagle Rock basins.<sup>31</sup> Both the LADWP

<sup>29</sup> *Total Maximum Daily Load (TMDL) is a regulatory term referring to the maximum amount of a pollutant that a body of water can receive per day while still meeting water quality standards.*

<sup>30</sup> *City of Los Angeles, Department of Water and Power, Urban Water Management Plan, 2020, page 5-1.*

<sup>31</sup> *City of Los Angeles, Department of Water and Power, Urban Water Management Plan, 2020, pages 5-1 through 5-4.*

and the California Department of Water Resources have programs in place to monitor supply wells to prevent overdrafting of groundwater basins. Both the LADWP's groundwater pumping strategy is based on a "safe yield" strategy, in which the amount of water removed over a period of time equals the amount of water entering the groundwater basin through native and imported groundwater recharge. Furthermore, protection from potential overdraft conditions is a requirement of the various adjudication decrees, including the ULARA Judgement. LADWP addresses water supply needs through preparation of an Urban Water Management Plan (UWMP), which projects future water use demands and identifies water supplies to meet these demands and is updated every five years. The Project's water demand is not expected to exceed the demand under existing conditions, and therefore will be within the projections of the UWMP.

Accordingly, based on the above, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, impacts would be less than significant and no mitigation measures would be required.

**Mitigation Measures**

None required.

**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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) Physically divide an established community?**

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

The Project Site is located within the boundaries of the Wilshire Community Plan area. The Project proposes to change the use of the existing 5-story building from medical offices to medical clinics including a surgery center. This change would include a General Plan Amendment, Zone Change, and Height District change to change the property's zone and height district from CR-1L-O and CR-1VL-O to (T)(Q)C2-2D-O to allow the proposed change of use within the existing building. Construction consists of interior tenant improvements only and there is no new proposed

addition/no new floor area in conjunction with the requested entitlements. There are no changes to the existing attached parking garage. The Project would not directly disrupt, divide, or isolate an existing neighborhood or community, as the Project Site would remain in its existing physical condition, developed with a building and parking structure. Additionally, 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. As such, the Project would not physically divide an established community. Therefore, related impacts would be less than significant and no mitigation measures would be required.

### **Mitigation Measures**

None required.

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

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

Regionally, the Project Site is located within the planning area of the Southern California Association of Governments (SCAG), the federally designated metropolitan planning organization. SCAG is responsible for reviewing regionally significant local plans, projects, and programs for consistency with SCAG's adopted regional plans. As the Project proposes to change the use of the existing 5-story building from medical offices to medical clinics, and a General Plan Amendment, Zone Change, and Height District change to change the zone and land use designation, the Project does not meet the criteria for being regionally significant pursuant to the CEQA Guidelines, Section 15206(b)(2)(D); therefore, no further analysis of SCAG consistency is required.

Locally, the Project Site is located within the jurisdiction of the City of Los Angeles and is therefore subject to the land use designations and zoning regulations of local land use plans and zoning ordinances, discussed below.

#### **City of Los Angeles General Plan**

Land uses on the Project Site are guided by the General Plan. The General Plan sets forth goals, objectives, and programs to guide day-to-day land use policies and to meet the existing and future needs and desires of the community, while integrating the seven state-mandated elements, including Land Use, Transportation, Noise, Safety, Housing, Open Space, and Conservation, as well as the General Plan Framework Element, and includes an Air Quality Element and Health and Wellness Element (Plan for a Healthy Los Angeles). The Land Use Element of the General Plan consists of the General Plan Framework Element, which addresses Citywide policies, and also includes the 35 community plans that guide land use at a local level. The Project Site is located in the Wilshire Community Plan area, which is one of the 35 community plans of the Land Use Element. The following discusses the General Plan Framework Element and the Community Plan, which address land uses.

The Project includes a General Plan Amendment to change the property’s land use designation from Limited Commercial to Regional Center Commercial. The amendment would make the Project Site consistent with development patterns and the General Plan designation of most of the properties along Wilshire Boulevard between San Vicente Boulevard and La Brea Boulevard.

*General Plan Framework Element*

The General Plan Framework Element sets forth a citywide comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. Framework Element land use policies are implemented at the community level through community plans and specific plans. The Land Use Chapter of the Framework Element provides objectives and policies intended to serve as guidelines for the community plans. The consistency of the Project with applicable objectives and policies in the General Plan Framework Element is presented in **Table XI-1, Project Consistency with the Framework Element**. Applicable objectives and policies for the Project begin with Objective 3.1. As shown, the Project would be consistent with the applicable objectives and policies.

**Table XI-1  
Project Consistency with the Framework Element**

Objective/Policy <sup>1</sup>	Project Consistency
<b><i>Distribution of Land Uses</i></b>	
<b>Objective 3.1:</b> Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	<b>Consistent.</b> The Project would change the use of the existing building from medical office to medical clinic, in response to a need for additional clinics and surgery centers in the Project area. This use would add a medical clinic use adjacent to residential, office, commercial, and other medical uses, and within 3,500 feet of Cedars Sanai Medical Center.
<b><i>Land Use Chapter</i></b>	
<b>Objective 3.10:</b> 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.	<b>Consistent.</b> The Project proposes to change the use of the existing 5-story building from medical offices to medical clinics including a surgery center. This change would include a General Plan Amendment, Zone Change, and Height District change to change the property's land use designation from Limited Commercial to Regional Center Commercial, and change the property's zone and height district from CR-1L-O and CR-1VL-O to (T)(Q)C2-2D-O to allow the proposed change of use and to legalize the existing building's nonconforming FAR. The Project would allow the provision of medical clinic uses within the existing building, in response to a need for such services in the Project area. This use would add a medical clinic use adjacent to residential, office, commercial, and other medical uses within an urban area.
<b><i>Urban Form and Neighborhood Design Chapter</i></b>	
<b>Objective 5.2:</b> Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.	<b>Consistent.</b> The Project does not propose any new construction or building development; rather, the Project includes a General Plan Amendment and Zone Change, and a change of use from medical office to medical clinic use. The Project Site is located

**Table XI-1  
Project Consistency with the Framework Element**

Objective/Policy <sup>1</sup>	Project Consistency
	approximately 300 feet from Wilshire Boulevard, which is a major transportation corridor, and within 3,500 feet of Cedars Sinai Medical Center, which will allow for shorter trips for doctors, patients, and medical staff between facilities.
<b>Objective 5.5:</b> Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	<b>Consistent:</b> The Project allow continued use of an existing building, maintaining the existing quality of the public realm on and adjacent to the site.
<b>Objective 5.9:</b> Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	<b>Consistent:</b> The continuous visible and non-visible presence of employees and visitors at all times of the day would continue to provide a sense of security during evening and early morning hours. The building includes interior and exterior lighting for wayfinding and security.
<p><sup>1</sup> City of Los Angeles, <i>The Citywide General Plan Framework Element</i>, readopted August 2001. Source (table): EcoTierra Consulting, November 2024.</p>	

*Wilshire Community Plan*

The community plans are intended to promote an arrangement of land uses, streets, and services, which would encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The community plans are also intended to guide development in order to create a healthful and pleasing environment. The community plans coordinate development among the various communities of the City and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community. The Wilshire Community Plan guides land uses on the Project Site and in the surrounding areas within the Community Plan Area. With regard to residential land uses, the Community Plan identifies opportunities for the preservation and enhancement of the positive characteristics of residential neighborhoods while providing a variety of compatible new housing opportunities.

As discussed above, the Project Site is designated for Limited Commercial<sup>32</sup> land use; the Project proposes to change the use of the existing 5-story building from medical offices to medical clinics including a surgery center. This change would include a General Plan Amendment, Zone Change, and Height District change to change the property’s land use designation from Limited Commercial to Regional Center Commercial, and change the property’s zone and height district from CR-1L-O and CR-1VL-O to (T)(Q)C2-2D-O to allow the proposed change of use and to legalize the existing building’s nonconforming FAR. The Project’s consistency with the applicable objectives and policies of the Wilshire Community Plan is presented in **Table XI-2, Project Consistency with the Wilshire Community Plan**. As shown, the Project would be consistent with the applicable objectives and policies.

<sup>32</sup> City of Los Angeles, *General Plan Land Use Map, Wilshire Community Plan, as of March 5, 2014*, available at: <https://planning.lacity.gov/odocument/2ec22248-3c1e-4354-b5d1-096cdf9845ab/wilplanmap.pdf>.

**Table XI-2  
Project Consistency with the Wilshire Community Plan**

<b>Objective/Policy <sup>1</sup></b>	<b>Project Consistency</b>
<b>Objective 2-1:</b> Preserve and strengthen viable commercial development and provide additional opportunities for new commercial development and services within existing commercial areas.	<b>Consistent.</b> The Project proposes to change the use of the existing 5-story building from medical offices to medical clinics including a surgery center. This change would include a General Plan Amendment, Zone Change, and Height District change to change the property's land use designation from Limited Commercial to Regional Center Commercial, and change the property's zone and height district from CR-1L-O and CR-1VL-O to (T)(Q)C2-2D-O to allow the proposed change of use and to legalize the existing building's nonconforming FAR. In response to a need for such services in the Project area, the Project would preserve an existing commercial building by making the use of the building viable in response to existing demands.
<b>Policy 2-1.1:</b> New commercial uses should be located in existing established commercial areas or shopping centers.	<b>Consistent.</b> The Project would allow the continued use of an existing commercial building along a commercial corridor.
<b>Policy 2-1.2:</b> Protect existing and planned commercially zoned areas, especially in Regional Commercial Centers, from encroachment by stand alone residential development by adhering to the community plan land use designations.	<b>Consistent.</b> The Project would allow the continued use of an existing commercial building along a commercial corridor, preserving the site as a commercial use, thus not allowing encroachment of residential uses onto the site.
<b>Policy 2-1.3:</b> Enhance the viability of existing neighborhood stores and businesses which support the needs of local residents and are compatible with the neighborhood.	<b>Consistent.</b> The Project's proposed a General Plan Amendment from Limited Commercial to Regional Center Commercial would allow the provision of medical clinic uses within the existing building, in response to a need for such services in the Project area.
<i><sup>1</sup> City of Los Angeles Department of City Planning, Wilshire Community Plan, adopted September 19, 2001. Source (table): EcoTierra Consulting, November 2024.</i>	

### **Los Angeles Municipal Code**

Development of the Project Site is subject to the constraints of the Los Angeles Municipal Code (LAMC), specifically Chapter I, the Planning and Zoning Code. As part of the Project, the Project is requesting discretionary approval of: (1) a General Plan Amendment to change the property's land use designation from Limited Commercial to Regional Center Commercial pursuant to LAMC Section 11.56; and (2) a Zone and Height District Change from CR-1VL-O and CR-1VL-O to (T)(Q)C2-2D-O, in conjunction with a proposed change of use from 5 levels of medical offices to 5 levels of medical clinics and a surgery center in an existing building and to legalize the existing building's nonconforming FAR pursuant to LAMC Section 12.32-F and 12.32-Q.

The Project Site is located within the Wilshire Community Plan area and is designated by the Community Plan for Limited Commercial land uses with corresponding zones of C1, C1.5, C2, C4, P, CR, RAS3 and RAS4. The Project Site is zoned CR-1L-O (Limited Commercial – Height District 1L – Oil Drilling District) and CR-1VL-O (Limited Commercial – Height District 1VL – Oil

Drilling District). The CR zone permits office uses and pharmacies when they are in an office building, but does not permit medical clinic uses.

The Project would change the General Plan Land Use Designation of the Project Site from Limited Commercial to Regional Commercial, and the zoning designation from CR-1VL-O and CR-1VL-O to (T)(Q)C2-2D-O, to permit a change of use from medical offices to medical clinics including a surgery center in the existing 5-story, 68,500 square foot medical office and attached parking structure. The Regional Commercial land use designation had corresponding zones of CR, C1.5, C2, C4, P, PB, RAS3, RAS4, R3, R4, and R5. The C2 zone permits medical clinics and laboratories.

The zone change would permit the existing building's nonconforming FAR which is over 1.5:1. The Project's proposed General Plan Amendment, through the unmodified Footnote 6, makes the Project Site subject to Height District 2. Generally, Height District 2 in the C zone allows unlimited height with an FAR of 6.0:1; however, a proposed "Q" Condition and "D" Limitation could limit the Project Site FAR to the existing FAR which is currently nonconforming because it is over 1.5:1 FAR, similar to the maximum FAR allowed under the D limitation applicable to neighboring commercial properties along Wilshire Boulevard.

The proposed General Plan Amendment to Regional Commercial would be consistent with adjacent development patterns and the existing zoning of similarly situated commercial properties along Wilshire Boulevard and at the corners of Wilshire Boulevard and San Vicente Boulevard. The Project's proposed General Plan Amendment and Zone Change would bring the existing building into conformance, and would permit the use of the building for medical clinics. The site would be more compliant with the zone and land use designation after approval of the Project.

The Project does not include any physical exterior changes to the existing building and therefore the Project would not conflict with LAMC standards related to lot size, height, setbacks, or lot coverage.

As detailed above, the Project would be consistent with the applicable land use plans, policies, and regulations. The Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts would be less than significant and no mitigation measures would be required.

### **Mitigation Measures**

None required.

## 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

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

The Project Site is located within the boundaries of a designated “O” zoned “Oil Drilling District”.<sup>33</sup> However, according to the California Geologic Energy Management Division, no oil, gas, geothermal, or other known wells are located on or adjacent to the Project Site.<sup>34</sup> The Project Site is fully developed, and no oil wells are present.<sup>35,36</sup> Due to the existing condition of the Project Site, the nature of the surroundings, as well as the lack of current and previous mineral extraction activities onsite or in the vicinity, Project implementation would not result in loss of availability of a known mineral resource of value to the region and residents of the state. Therefore, no impact to state or regionally important mineral resources would occur.

### Mitigation Measures

None required.

<sup>33</sup> City of Los Angeles Department of City Planning, Zone Information & Map Access System.

<sup>34</sup> California Department of Conservation, California Geologic Energy Management Division, Well Finder, <https://maps.conservation.ca.gov/doggr/wellfinder/>, accessed December 2024.

<sup>35</sup> City of Los Angeles Department of City Planning, Zone Information & Map Access System.

<sup>36</sup> California Department of Conservation, California Geologic Energy Management Division, Well Finder, <https://maps.conservation.ca.gov/doggr/wellfinder/>, accessed December 2024.

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

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

As detailed in response to Threshold a) above, the Project Site is zoned as within an Oil Drilling District. However, there are no oil wells on the Project Site, and the Project Site is fully paved and developed. The Project does not propose any excavation or extraction of resources that may be underlying the site, and as such, the Project would not result in the loss of availability of a known mineral resource recovery site of local importance. Therefore, no impacts would occur and no mitigation measures would be required.

**Mitigation Measures**

None required.

**XIII. NOISE**

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

**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?**

**Less than Significant Impact.** A significant impact may occur if the project would generate excess noise that would cause the ambient noise environment at the Project Site to fail to comply with noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance) (Section 111.00 through Section 116.01 of the LAMC).

The Project does not propose any construction activities. Interior tenant improvements would be required to comply with established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise-sensitive land uses per the LAMC. LAMC Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools) limits construction-generated noise within 500 feet of residential land uses to a maximum of 75 decibels (dB) at 50 feet from the source. Interior tenant improvements in the building would be required to comply with existing noise regulations, and because the improvements would be entirely within the existing building, the proposed improvements would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local noise ordinance.

Operational noise associated with the Project would be the same as under existing conditions: noise generated by heating, ventilation, and air conditioning (“HVAC”) equipment. The noise levels generated by the proposed medical clinic use of the building are not anticipated to be substantially greater than those generated by the existing medical office use of the building. In addition, the operation of this and any other on-site stationary sources of noise would continue to be required to comply with the LAMC Section 112.02 (Air Conditioning, Refrigeration, Heating, Pumping, Filtering Equipment), which prohibits noise from HVAC equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five dB. Thus, because the noise levels generated by the HVAC equipment serving the building would not be allowed to exceed the ambient noise level by five dB on the premises of the adjacent properties, operation of the Project would not generate a substantial increase in ambient noise levels in excess of standards established in the local noise ordinance. As such, impacts would be less than significant and no mitigation measures would be required.

**Mitigation Measures**

None required.

**b) Generation of excessive groundborne vibration or groundborne noise levels?**

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

The Project does not include any proposed construction or excavation that would be expected to generate vibrations that spread through the ground. The interior tenant improvements proposed as part of the Project would not require the use of equipment such as pile drivers or bulldozers, which are known to generate substantial construction vibration levels. Accordingly, the interior

tenant improvements associated with the Project would not generate vibration levels that would result in structural damage to existing buildings on or near the Project Site.

The primary sources of vibration from the Project Site during operation would be delivery trucks and passenger vehicles. According to the FTA, delivery trucks rarely generate groundborne vibration that exceeds 70 VdB,<sup>37</sup> which is equivalent to approximately 0.013 in/sec PPV, which would be less than the significance threshold of 0.2 in/sec PPV for potential building damage. As passenger vehicles are much smaller than delivery trucks, the groundborne vibration from passenger vehicles would be lower. Furthermore, such sources are typical of urban environments and the Project would not require a substantial number of additional delivery or passenger vehicle trips compared to existing conditions. As such, operation of the Project would not generate excessive vibration levels. Therefore, impacts would be less than significant and no mitigation measures would be required.

### **Mitigation Measures**

None required.

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

**No Impact.** A significant impact would occur if the Project were located in 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 and would expose people residing or working in the Project area to excessive noise levels.

As discussed in response to **Checklist Question IX(e)** above, the Project Site is not located within any airport's influence area nor within two miles of an existing airport.<sup>38</sup> The Project Site is not located within any airport's influence area nor within two miles of an existing airport.<sup>39</sup> The nearest airport is the Santa Monica Airport (3233 Donald Douglas Loop S, Santa Monica), located approximately 5.37 miles to the southwest. As such, the Project would not expose people to excessive noise from airports. Therefore, no impacts would occur and no mitigation measures would be required.

### **Mitigation Measures**

None required.

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<sup>37</sup> FTA, *Transit Noise and Vibration Impact Assessment Manual*, 2018, page 113.

<sup>38</sup> County of Los Angeles, Department of Regional Planning, *Airports and Airport Influence Areas, August 2018*, [https://case.planning.lacounty.gov/assets/upl/project/ALUC\\_Airports\\_Aug2018\\_rev3.pdf](https://case.planning.lacounty.gov/assets/upl/project/ALUC_Airports_Aug2018_rev3.pdf), accessed December 19, 2024.

<sup>39</sup> County of Los Angeles, Department of Regional Planning, *Airports and Airport Influence Areas, August 2018*, [https://case.planning.lacounty.gov/assets/upl/project/ALUC\\_Airports\\_Aug2018\\_rev3.pdf](https://case.planning.lacounty.gov/assets/upl/project/ALUC_Airports_Aug2018_rev3.pdf), accessed December 19, 2024.

## 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**Less than Significant Impact.** A potentially significant impact would occur if the proposed project would induce substantial population growth that would not have otherwise occurred as rapidly or in as great a magnitude.

The proposes to change the use of the existing 5-story building from medical offices to medical clinics. This change would include a General Plan Amendment, Zone Change, and Height District change to change the zone and land use from CR-1VL-O and CR-1VL-O to (T)(Q)C2-2D-O to allow the change of use. Construction consists of interior tenant improvements; there are no changes proposed to the building envelope or size of the existing building. The Project does not include any extension or expansion of utilities infrastructure or roadways. Therefore, the Project would not result in substantial or unplanned indirect population growth.

Because the Project would not induce substantial unplanned growth directly or indirectly, impacts would be less than significant and no mitigation measures would be required.

### Mitigation Measures

None required.

**b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

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

The Project Site is currently developed with a 5-story building used as medical offices. There are no housing units on the site, and no housing units are proposed to be removed. As such, the Project would not displace substantial numbers of existing people or housing and the construction of replacement housing elsewhere would not be required. Therefore, no impacts would occur and no mitigation measures would be required.

**Mitigation Measures**

None required.

**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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:**

**a. Fire Protection?**

**Less than Significant Impact.** Based on the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service.

The City of Los Angeles Fire Department (LAFD) provides fire protection services in the City, including at the Project Site. The Project Site is served by Fire Station 61 (5821 West 3<sup>rd</sup> Street) located approximately 1.8-roadway-miles northeast of the Site.<sup>40</sup> The proposes to change the use of the existing 5-story building from medical offices to medical clinics including a surgery center. This change would include a General Plan Amendment, Zone Change, and Height District change

<sup>40</sup> City of Los Angeles Fire Department, *Find Your Station*, available at: <https://www.lafd.org/fire-stations/station-results>, accessed December 2024.

to change the zone and land use from CR-1VL-O and CR-1VL-O to (T)(Q)C2-2D-O (to allow the change of use). Construction consists of interior tenant improvements; there are no changes proposed to the building envelope or size of the existing building. Thus, the Project is not expected to change demand on fire services.

The Project Site would continue be required to adhere to City Building and Fire Code requirements regarding building components including, but not limited to, structural design, building materials, site access, clearance, hydrants, fire flow, storage and management of hazardous materials, alarm and communications systems, and building sprinkler systems. Compliance with the Los Angeles Building Code and LAFD standards is mandatory and the building is subject to Fire Life Safety Plan Checks and Fire Life Safety Inspections, which aim to enforce applicable standards of the California Fire Code (Title 24, Part 9), California Code of Regulations Title 19, and the Los Angeles Fire Code (LAMC Chapter 5, Article 7).

Overall, given that the Project is not anticipated to result in an increased demand for services, the availability and close proximity of existing fire protection services, and the applicable regulatory requirements of the 2022 California Building Code, 2022 California Fire Code, the LAMC, and the LAFD, the Project would not be expected to be beyond the scope of available fire services. The Project can be adequately served by fire protection services. As such, the Project would not 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 fire protection. Impacts would be less than significant and no mitigation would be required.

### **Mitigation Measures**

None required.

#### **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 objective.

The Project Site is served by the City of Los Angeles Police Department's (LAPD) Wilshire Community Police Station (Wilshire Station), which is located approximately 3 roadway-miles southeast of the Project Site.<sup>41</sup> Wilshire Station is under the West Bureau and serves a residential population of approximately 251,000 people. Wilshire Station's boundaries cover 13.97 square miles.<sup>42</sup>

The Project is not expected to change activities associated with the existing building in a way that would increase demand for police protection services. The Project would continue to include

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<sup>41</sup> Los Angeles Police Department, *Community Police Station Address Directory*, available at: <https://www.lapdonline.org/find-your-local-police-station/>, accessed December 2024.

<sup>42</sup> Los Angeles Police Department, *Hollenbeck Community Police Station*, available at: <https://www.lapdonline.org/lapd-contact/west-bureau/wilshire-community-police-station/>, accessed December 2024.

security features at the building and parking structure including night lighting to illuminate the entrances, driveways, and parking area; and secured entry. The Project is not anticipated to result in any increase in demands upon police protection services, and thus would not necessitate the construction of a new police station, the construction of which could potentially cause environmental impacts. The Project would not be expected to be beyond the scope of available police services. Accordingly, the Project would not substantially increase the demand for police protection services or interfere with emergency access such that new or expanded police protection services would be required.

Therefore, the Project would not 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 police protection. Impacts would be less than significant and no mitigation measures would be required.

### **Mitigation Measures**

None required.

#### **c. Schools?**

**Less than Significant Impact.** A significant impact may occur if a proposed project includes substantial employment or population growth, which could generate demand for school facilities that exceeds the capacity of the school district(s) responsible for serving the project site.

The Project is in an area that is currently served by several Los Angeles Unified School District (LAUSD) public schools, as well as several private schools and after-school programs. LAUSD is the nation's second-largest school district, operating 1,438 schools and centers serving 563,083 students and employing 74,741 employees in 710 square-miles.<sup>43</sup>

As previously discussed, the Project is not expected to change activities associated with the existing building in a way that would result in substantial employment or population growth. Thus, it is not expected that the Project would generate demand for school facilities that exceeds the capacity of the school district(s) responsible for serving the Project Site. Therefore, impacts would be less than significant and no mitigation measures would be required.

### **Mitigation Measures**

None required.

#### **d. Parks?**

**Less than Significant Impact.** A significant impact to parks may 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.

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<sup>43</sup> Los Angeles unified School District, *Fingertip Facts, 2023-24*, <https://www.lausd.org/site/handlers/filedownload.ashx?moduleinstanceid=81764&dataid=135710&FileName=Fingertip%20Facts%202023-2024.pdf>, accessed December 21, 2024.

The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipal recreation and park facilities within the City. As previously discussed, the Project is not expected to result in any direct or indirect population growth, and the Project would not be expected to increase the use of parks to a degree that would cause deterioration of existing facilities or necessitate the construction of additional or expansion of existing facilities. Therefore, through provision of onsite recreation facilities and payment of required park fees, impacts to parks would be less than significant and no mitigation would be required.

### **Mitigation Measures**

None required.

#### **e. Other public facilities?**

**Less than Significant Impact.** A significant impact may occur if a project generates a demand for other public facilities (such as libraries) that exceeds the capacity available. Los Angeles Public Library (LAPL) provides library services to the City. On March 8, 2011, City voters approved ballot Measure L, which amends the City Charter to incrementally increase the amount the City is required to dedicate annually from its General Fund to LAPL to an amount equal to 0.03-percent of the assessed value of all property in the City, and incrementally increase LAPL's financial responsibility until it pays for all of its direct and indirect costs. The measure was intended to provide neighborhood public libraries with additional funding to help restore library service hours, purchase books, and support library programs, subject to audits, using existing funds with no new taxes.<sup>44</sup> Beginning in fiscal year 2014-2015 and thereafter, LAPL was to be responsible for payment of all of its direct and indirect costs.<sup>45</sup>

LAPL's existing service level would be maintained without an additional library or alterations to the existing libraries required by the Project. The Project is not expected to result in any direct or indirect population growth, and therefore would not generate additional demand for library services of a level that would create substantial capacity or service level problems that would require the provision of new or expanded public facilities in order to maintain an acceptable level of service. Therefore, impacts would be less than significant and no mitigation would be required.

### **Mitigation Measures**

None required.

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<sup>44</sup> Los Angeles Office of the City Clerk, *Interdepartmental Correspondence and Attachments Regarding Measure L*.

<sup>45</sup> Los Angeles Office of the City Clerk, *Interdepartmental Correspondence and Attachments Regarding Measure L*, website: [http://clkrep.lacity.org/onlinedocs/2011/11-1100-S2\\_rpt\\_cao\\_11-16-10.pdf](http://clkrep.lacity.org/onlinedocs/2011/11-1100-S2_rpt_cao_11-16-10.pdf). Accessed January 2023.

## 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**Less than Significant Impact.** A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for park or recreational facilities that would cause substantial physical deterioration of the park facilities, or if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment.

As detailed above in response to **Checklist Question XV(d)**, is not expected to result in any direct or indirect population growth, and therefore would not be expected to increase the use of existing parks and recreational facilities such that substantial physical deterioration would occur nor would it require the construction or expansion of such facilities which might have an adverse physical effect on the environment. Therefore, impacts would be less than significant and no mitigation measures would be required.

### Mitigation Measures

None required.

## 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**Less than Significant Impact.** A significant impact may occur if a project would conflict with a program plan, ordinance, or policy designed to maintain adequate effectiveness of an overall circulation system, including transit, roadway, bicycle and pedestrian facilities.

This analysis was prepared by reviewing Table 2.1-2, Questions to Determine Project Applicability to Plans, Policies and Programs, of the Transportation Assessment Guidelines (TAG) for determining Project applicability to plans, policies, and programs such as the Los Angeles Mobility Plan 2035, Vision Zero Los Angeles, municipal code sections and Wilshire Community Plan. A project that generally conforms with and does not obstruct the City's development policies and standards will generally be considered to be consistent.

### Screening

The City of Los Angeles aims to achieve an accessible and sustainable transportation system that meets the needs of all users. The City's adopted transportation-related plans and policies affirm that streets should be safe and convenient for all users of the transportation system, including pedestrians, bicyclists, motorists, public transit riders, disabled persons, senior citizens, children, and movers of commercial goods. In their Transportation Assessment Guidelines (TAG),<sup>46</sup> the Los Angeles Department of Transportation (LADOT) provides projects criteria to identify which projects must check for consistency with major City plans and policies and provides updated references that should be consulted to evaluate how proposed projects and plans relate to adopted City projects and plans. The TAG establishes that if a project requires a discretionary action, and the answer is "yes" to any of the following questions, further analysis is required:

<sup>46</sup> City of Los Angeles, Department of Transportation, Transportation Assessment Guidelines, August 2022.

- Does the project require a discretionary action that requires the decisions maker to find that the decision substantially conforms to the purpose, intent, and provisions of the General Plan?
- Is the project known to directly conflict with a transportation plan, policy, or program adopted to support multimodal transportation options or public safety?
- Is the project required to or proposing to make any voluntary modifications to the public right-of-way (i.e., dedications and/or improvements in the right-of-way, reconfigurations of curb line, etc.)?

The Project is not known to directly conflict with a transportation plan, policy, or program adopted to support multimodal transportation options or public safety; the Project would not include any modifications to the public right-of-way; however, the Project does require a discretionary determination that the Project conforms to the purpose, intent, and provisions of the General Plan.

### **Analysis**

Attachment D of the TAG outlines a streamlined approach to evaluate a project's consistency with the most relevant plans, policies, and programs addressing the City's circulation system and includes specific questions for identifying potential conflicts with specific Mobility Plan 2035 policies pertaining to street dedications and standard roadway dimensions; the public right-of-way; multimodal access; and parking management; as well as with the greenhouse gas reduction targets of SCAG's RTP/SCS. The Project includes a discretionary approval for a General Plan Amendment, Zone Change, and Height District change to change the property's land use designation from Limited Commercial to Regional Center Commercial and change the property's zone and height district from CR-1L-O and CR-1VL-O to (T)(Q)C2-2D-O to allow the change of use from medical office building to medical clinics and surgery center within the existing 68,500-square-foot building. The Project does not propose to physically modify the built environment of the site, nor the surrounding streets or rights-of-way. The Project would not add or remove driveways or any other street improvements. As such, consistent with the guidance provided in Attachment D of the TAG, the Project would not conflict with the policies of Mobility Plan 2035 pertaining to the public right-of-way.

The Project does not propose to vacate or otherwise restrict public access to a street, alley, or public stairway and is not located adjacent to an existing cul-de-sac nor would it create a cul-de-sac. As such, consistent with the guidance provided in Attachment D of the TAG, the Project would not conflict with the policies of Mobility Plan 2035 pertaining to multimodal access.

The Project will retain the existing parking structure on site, which contains code-compliant vehicular parking and bicycle parking and repair facilities. As such, consistent with the guidance provided in Attachment D of the TAG, the Project would not conflict with the policies of Mobility Plan 2035 pertaining to parking management.

Based on the above, the Project would not conflict with the most relevant plans, policies, and programs addressing the City's circulation system. As such, impacts would be less than significant and no mitigation measures would be required.

### **Mitigation Measures**

None required.

**b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?**

**Less than Significant Impact.** A significant impact may occur if a project's vehicle miles traveled substantially increase compared to existing counts.

**Screening**

For land use projects, the intent of this Checklist Question is to assess whether a land use project or plan causes substantial vehicle miles traveled. In their TAG, the LADOT has developed the following screening and impact criteria to address this question:

If a project requires discretionary action (such as the proposed Project) and the answer is "no" to either of the criteria below, further analysis with regard to this Checklist Question is not required and a "no impact" determination can be made:

- **T-2.1-1:** Would the land use project generate a net increase of 250 or more daily vehicle trips?

LADOT determined that the Project's proposed medical clinic and surgery center use would generate 1,942 daily vehicle trips, compared to the 1,852 daily trips currently generated by the existing medical office use, resulting in a net increase of 90 daily trips.<sup>47</sup> Accordingly, the Project would not generate a net increase of 250 or more daily vehicle trips and the answer to this criterion is "no."

- **T-2.1-2:** Would the project generate a net increase in daily VMT?

As detailed above, the Project is expected to generate a net increase of 90 daily VMT compared to existing conditions, and the answer to this criterion is "yes."

Although the Project would generate a net increase in daily VMT and the answer to criterion T-2.1-2 is "yes," because the TAG establishes that further analysis is not required if the answer to either criterion is "no," and because the Project would not generate a net increase of 250 or more daily vehicle trips and the answer to criterion T-2.1-1 is "no," no further analysis with regard to **Checklist Question XVII(b)** is required and a no impact determination can be made. Based on the above, the Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Impacts would be less than significant and no mitigation would be required.

**Mitigation Measures**

None required.

**c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

**No Impact.** A significant impact may occur if a project includes new roadway design or introduced a new land use or project features into an area with specific transportation requirements,

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<sup>47</sup> Los Angeles Department of Transportation Referral Form, case number CPC-2023-5444-GPA-ZC-HD, signed by Griselda Gonzales March 18, 2024.

characteristics, or project access or other features designed in such a way as to create hazardous conditions.

## **Screening**

### *Geometric Design Features*

The TAG includes the following screening and impact criteria to address this Checklist Question:

If a project requires discretionary action (such as the proposed Project) and the answer is “yes” to either of the following questions, further analysis with regard to this Checklist Question is required:

- Is the project proposing new driveways, or introducing new vehicle access to the property from the public right-of-way?
- Is the project proposing to make any voluntary or required modifications to the public right-of-way (i.e., street dedications, reconfiguration of curb line, etc.)?

The Project does not include any new driveways or vehicle access and would not make any modifications to the public right-of-way. As such, the answer to both of the above questions is “no,” and no further analysis of the Project’s potential to increase hazards due to geometric design features is required.

### *Freeway Off-Ramp Queuing*

In addition to the screening questions above, the TAG includes the following questions to determine potential impacts due to queuing from a freeway off-ramp that could lead to unsafe differential travel speeds:

If the answer is “yes” to all of the following questions, further analysis is required:

- Does the land use project involve a discretionary action that would be under review by the Department of City Planning?
- Would the land use project generate a net increase of 250 or more daily vehicle trips?
- Would the land use project add 25 or more trips to any off ramp in either the morning or afternoon peak hour?

As previously detailed, the Project would generate a net increase of 90 daily vehicle trips, which would not have the potential to add 25 or more trips to any off ramp in either the morning or afternoon peak hour. Therefore, although the Project requires discretionary action by the City and the answer to the first question is “yes,” because the TAG requires a “yes” answer to all three of the above questions in order to require further analysis of impacts to freeway off ramps, and because the answer to the other two questions is “no,” no further analysis of the Project’s impacts to freeway off ramps is required.

## **Conclusion**

Based on the above, in accordance with the guidance provided in the City’s TAG, the Project would not substantially increase hazards due to geometric design feature. Additionally, the Project

does not propose to introduce any incompatible uses such as farm or industrial equipment. As such, impacts would be less than significant and no mitigation would be required.

#### **Mitigation Measures**

None required.

#### **d) Result in inadequate emergency access?**

**Less than Significant Impact.** A significant impact may occur if a project design does not provide emergency access meeting the requirements of the LAFD or in any other way threatens the ability of emergency vehicles to access and serve the project site or adjacent uses.

The Project does not propose any temporary or permanent alterations to vehicular circulation routes and patterns or impede public access or travel upon public rights-of-way. Emergency vehicle access to the Project Site would continue to be provided from S. San Vicente Boulevard and Orange Street and the adjacent alley as needed. No changes to the existing built environment of the site or the surrounding rights-of-way are proposed as part of the Project. The Project would introduce additional traffic in the Project vicinity, which could potentially affect emergency response to the Project Site and surrounding properties. However, as discussed above, additional Project-related trips would be minimal (an estimated net increase of 90 daily trips) and impacts associated with traffic volume would be less than significant. Furthermore, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic, pursuant to California Vehicle Code Section 21806. The Project does not include the installation of barriers (e.g. perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site.

Based on the above, emergency access to the Project Site and surrounding uses would be maintained at all times. As such, the Project would not result in inadequate emergency access. Therefore, impacts would be less than significant and no mitigation measures would be required.

#### **Mitigation Measures**

None required.

## XVIII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category: tribal cultural resources. AB 52 establishes that “a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a Project that may have a significant effect on the environment” (PRC Section 21084.2). AB 52 further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified or adopted. Under AB 52, lead agencies are required to “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed Project.” Native American tribes to be included in the process are those that have requested notice of Projects proposed within the jurisdiction of the lead agency. As specified in AB 52, a lead agency must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. The Tribe must respond within 30 days of the City’s AB 52 notice.

## AB 52 Consultation

On June 18, 2025, an informational letter was mailed to a total of eleven California Native American tribes known to have resources in the Project area and requesting any information regarding resources that may exist on or near the Project Site. One response was received, from the Gabrieleño Band of Mission Indians - Kizh Nation which stated no opposition to the Project and a request for notification if any ground disturbing activities are proposed in the future.

**a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?**
- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

**No Impact.** As detailed in **Checklist Section V, Cultural Resources**, the Project Site has not been designated or identified as eligible or potentially eligible for designation as an historic resource, including as an Historic-Cultural Monument.<sup>48</sup> The Project Site is also not located within an Historic Preservation Overlay Zone.<sup>49</sup> The Project Site is located adjacent to the 6<sup>th</sup> Street-Orange Street Multi-Family Residential Historic District and several individual historic resources or potentially eligible historic resources including 6617 W. Orange Street. The Project does not propose any physical changes to the existing on-site conditions, and will not change the existing developed buildings. In addition, based on a review of City of Los Angeles Prehistoric and Historic Archaeological Sites and Survey Areas Map, the Project Site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas.<sup>50</sup>

The Project does not include any excavation, grading, demolition, or construction activities that could cause a substantial adverse change in the significance of a tribal cultural resource. Thus, the project would not result in inadvertently discovery of unknown resources at the Project Site. No impact would occur and no mitigation would be required.

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<sup>48</sup> *City of Los Angeles Department of City Planning, Office of Historic Resources, Historic Places LA online map, available at: <http://www.historicplacesla.org/map>, accessed November 2024.*

<sup>49</sup> *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed November 2024.*

<sup>50</sup> *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-1 – Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, page 2.15-3.*

**Mitigation Measures**

None required.

**XIX. UTILITIES AND SERVICE SYSTEMS**

	<u>Potentially Significant Impact</u>	<u>Less than Significant with Mitigation Incorporated</u>	<u>Less than Significant Impact</u>	<u>No Impact</u>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) 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?**

**Less than Significant Impact.** A significant impact may occur if a project would require or result in the relocation or construction of water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities to such a degree that the construction or relocation of which could cause significant environmental effects.

## Water Facilities

The LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes 115 storage tanks and reservoirs, 84 pump stations, 60,988 fire hydrants, 7,336 miles of distribution mains, and a total storage capacity of 323,820 acre-feet.<sup>51</sup> Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area.<sup>52</sup> The Project area is served by existing water distribution mains beneath the adjacent streets.

The Project does not include any building construction and does not include expansion or installation of new water delivery infrastructure at the Project Site. Implementation of Project would not be expected to result in significantly increased demand compared to existing conditions and is therefore within water supply demand projections, which LADWP anticipates having adequate supplies for through 2045 under normal, dry, and multiple dry year conditions, including during drought conditions over the next 5-years.<sup>53</sup> Therefore, LADWP would be able to adequately serve the Project's water demand without constructing new or expanding existing water supply infrastructure, such as reservoirs, treatment plants, pump stations, or water mains, beyond what has already been planned for and the environmental impacts of evaluated as part of LADWP's long-range planning efforts.

LADWP also supplies water for fire protection services. The Project does not propose any changes to the existing hydrants in the vicinity, which would continue to be available to serve the Project Site. Therefore, no changes to existing water services are anticipated and impacts associated with construction or expansion of water facilities would be less than significant; no mitigation would be required.

## Wastewater Facilities

The City's Bureau of Sanitation (LASAN) provides sewer service to the Project area. The Project does not include any building construction and does not include or anticipate the need for expansion or installation of new wastewater conveyance infrastructure at the Project Site.

Following on-site collection and conveyance through the local off-site infrastructure, sewage from the Project is ultimately conveyed to the Hyperion Water Reclamation Plant (HWRP). The HWRP treats an average daily flow of 275 million gallons per day (mgd) in dry weather. Because the amount of wastewater entering the HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days, with a maximum daily flow of 450 mgd and peak wet weather flow of 800 mgd.<sup>54</sup> This equals a typical remaining capacity of 175 mgd of wastewater

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<sup>51</sup> Los Angeles Department of Water and Power Website, *About Us, Water Facts & Figures*, available at: <https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?>, accessed December 2024.

<sup>52</sup> LADWP, *2021-2022 Briefing Book*, 2022.

<sup>53</sup> City of Los Angeles, Department of Water and Power, *2020 Urban Water Management Plan, Certified May 25, 2021*, page ES-19, website: <https://www.ladwp.com/cs/groups/ladwp/documents/pdf/mdaw/nzyy/~edisp/opladwpccb762836.pdf>, accessed December 2024.

<sup>54</sup> City of Los Angeles Department of Public Works, Bureau of Sanitation, *Clean Water, Hyperion Water Reclamation Plant*, available at: [https://sanitation.lacity.gov/san/faces/wcnav\\_externalId/s-lsh-wwd-cw-p-hwrp-tp?\\_adf.ctrl-state=6a0joxf1t\\_5&\\_afLoop=6976996063970489#!](https://sanitation.lacity.gov/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=6a0joxf1t_5&_afLoop=6976996063970489#!), accessed December 2024.

able to be treated at the HWRP. The Project's proposed change of use from medical office to medical clinic and surgery center would be expected to represent an extremely negligible increase in wastewater conveyed from the Project Site compared to existing conditions, which can be adequately accommodated by the remaining daily capacity at the HWP. Therefore, the Project would not require construction or expansion of wastewater treatment facilities. No impacts would occur and no mitigation would be required.

### **Stormwater Drainage Facilities**

Stormwater at the Project Site currently sheet flows to the existing underground stormwater drainage facilities located in the surrounding streets. As detailed in response to **Checklist Question X(c)**, the Project would continue to direct stormwater flows to the existing drainage features, as no changes to the building or surrounding hardscape or rights-of-way are proposed. Accordingly, impacts to stormwater drainage facilities would be less than significant and no mitigation measures would be required.

### **Electric Power Facilities**

The LADWP currently owns and operates four natural gas-fired generating stations located within the Los Angeles Basin: the Harbor Generating Station, located near the Port of Los Angeles; the Haynes Generating Station, located in Seal Beach; Scattergood Generating Station, located near Los Angeles International Airport; and Valley Generating Station, located in the San Fernando Valley. Also owned and operated by LADWP is the Castaic Power Plant, a pumped-storage hydroelectric generation facility located in Castaic, California, and has contracts for a portion of the generating capacity from: the Intermountain Power Project, a coal-fired power plant located in Delta, Utah; Hoover Dam hydroelectric power plant in Nevada, and the Pal Verde Generating Station, a nuclear power plant located in Arizona. The LADWP also owns or has power purchase agreements for: several renewable energy generating facilities including several solar, wind, and small hydroelectric facilities in Owens Valley; wind facilities located in Utah, New Mexico, Oregon, Wyoming, and Washington State; and geothermal and solar facilities in California and Nevada.<sup>55</sup> LADWP delivers electricity to customers via 4,040 miles of overhead transmission circuits, 135 miles of underground transmission circuits, 3,801 miles of underground distribution cables, 7,266 miles of overhead distribution lines, 130,703 distribution transformers, and 300,884 distribution utility poles.<sup>56</sup> The Project area currently receives electricity via overhead distribution cables.

As discussed in response to **Checklist Question VI(a)**, the Project would represent a negligible percentage of LADWP's projected electrical supplies. Therefore, new or expanded electrical generation or transmission infrastructure would not be required. Furthermore, LADWP routinely plans capacity additions and changes at existing and new facilities as needed to supply area load based on consideration of projects within the City that may affect energy demand, including new development, such as the Project. Accordingly, the Project's electrical consumption would be part of the total load growth forecast for the LADWP service area and accounted for in the planned growth of the City's power system. In addition, as there are already electrical power lines in the vicinity serving the existing building, new or expanded local distribution and delivery infrastructure would not be required, nor would capacity-enhancing alterations to existing facilities be required.

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<sup>55</sup> Los Angeles Department of Water and Power, 2022 Power Strategic Long-Term Resource Plan, pages 1-8 and 1-9.

<sup>56</sup> Los Angeles Department of Water and Power, 2022 Power Strategic Long-Term Resource Plan, page 1-7.

from Project implementation. The installation of any new on-site electrical equipment as a result of interior tenant improvements to the building (wiring, meters, etc.) would occur as normal building upgrade operations subject to permits and would not result in any adverse environmental effects. Therefore, impacts associated with construction or expansion of electrical power facilities would be less than significant and no mitigation would be required.

### **Natural Gas Facilities**

SoCalGas would supply the Project from the existing natural gas facilities. The Project would continue to be served by the existing natural gas facilities and connections at the building, which would be upgraded over time as needed. Based on the 2020 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2,349 million cf per day in 2024 and supplies in 2024 are projected to be 3,435 million cf per day.<sup>57</sup> As the Project is not expected to result in a notable increase in natural gas demand, it is expected that SoCalGas' existing and planned natural gas capacity and supplies will be sufficient to serve the Project's demand. Thus, the Project would not increase demand for natural gas that would require the construction of new natural gas facilities which could result in significant environmental effects. Accordingly, impacts would be less than significant, and no mitigation measures would be required.

### **Telecommunication Facilities**

The Project Site would continue to be served by the telecommunication infrastructure serving the Project Site under existing conditions. The relocation of new telecommunication facilities would not be required and thus would not cause significant environmental effects. Furthermore, telecommunication services are provided by private companies, the selection of which is at the discretion of the applicant and/or the successor on an ongoing basis. Upgrades to existing telecommunication facilities and construction of new facilities to meet the demand of users is determined by providers and is subject to its own environmental review. Accordingly, impacts associated with construction or expansion of telecommunication facilities would be less than significant and no mitigation would be required.

### **Mitigation Measures**

None required.

#### **b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

**Less than Significant Impact.** A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers.

The City's water supply primarily comes from the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California (MWD), which is obtained from the Colorado River Aqueduct, and to a lesser degree from local groundwater sources. The Project proposes continued use of the existing building with a change of use from

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<sup>57</sup> *California Gas and Electric Utilities, 2020 California Gas Report, Table 1-SCG, p. 144.*

medical offices to medical clinics and a surgery center. This change of use may increase water consumption within the building but is not expected to result in a significant change to demand over existing conditions as there is no change in the size of the building proposed. Additionally, as interior tenant improvements are made over time, such improvements would be required to implement water saving features to reduce the amount of water used by the Project including high-efficiency toilets, low-flow showerheads and faucets, and high-efficiency appliances. All fixtures would be required to meet applicable flush volumes and flow rates when upgraded. The Project does not include any new or additional landscaping.

LADWP's 2020 Urban Water Management Plan (2020 UWMP) confirmed that despite an increase in population of over one million people, over the last 20 years, the City's water demand has been reduced by 29 percent; with the average water usage below the average usage in the 1970s.<sup>58</sup> The City is also focused on increasing locally produced water supplies, including conservation, water use efficiency, stormwater recycling, and maximizing water reuse from the Hyperion Water Reclamation Plant (Operation NEXT), and will continue to pursue and/or investigate alternative water supply options, such as water transfers, groundwater banking, brackish groundwater recovery, and seawater desalination. Based on these approaches, the 2020 UWMP projects future water demand within the City under single-dry years, average, and multiple-dry years hydrological conditions through the 2045 planning horizon year and identifies existing and potential supplies available to continue to meet demand. Projected future water demands and available supply amounts for the City are presented in Table XIX-1, LADWP Water Supply and Demand Projections.

**Table XIX-1  
LADWP Water Supply and Demand Projections**

Hydrological Condition	2025 (AFY)	2030 (AFY)	2035 (AFY)	2040 (AFY)	2045 (AFY)	Change Over Planning Period (AFY)
<b>Single-Dry Years</b>						
Total Supplies	674,700	693,200	712,700	732,700	746,000	72,000
Total Demands	674,700	693,200	712,700	732,700	746,000	72,000
<b>Average Years</b>						
Total Supplies	642,600	660,200	678,800	697,800	710,500	67,900
Total Demands	642,600	660,200	678,800	697,800	710,500	67,900
<b>Multiple-Dry Years (Year 1)</b>						
Total Supplies	657,900	675,800	694,900	714,400	727,400	69,500
Total Demands	657,900	675,800	694,900	714,400	727,400	69,500
<b>Multiple-Dry Years (Year 2)</b>						
Total Supplies	661,700	679,700	698,900	718,500	731,500	69,800
Total Demands	661,700	679,700	698,900	718,500	731,500	69,800
<b>Multiple-Dry Years (Year 3)</b>						
Total Supplies	674,800	693,200	712,800	732,700	746,000	71,200
Total Demands	674,800	693,200	712,800	732,700	746,000	71,200
<b>Multiple-Dry Years (Year 4)</b>						
Total Supplies	661,600	679,600	698,900	718,400	731,500	69,900
Total Demands	661,600	679,600	698,900	718,400	731,500	69,900
<b>Multiple-Dry Years (Year 5)</b>						
Total Supplies	655,700	673,600	692,600	712,000	724,900	69,200

<sup>58</sup> City of Los Angeles, Department of Water and Power, 2020 Urban Water Management Plan, Certified May 25, 2021, page ES-3.

**Table XIX-1  
LADWP Water Supply and Demand Projections**

<b>Hydrological Condition</b>	<b>2025 (AFY)</b>	<b>2030 (AFY)</b>	<b>2035 (AFY)</b>	<b>2040 (AFY)</b>	<b>2045 (AFY)</b>	<b>Change Over Planning Period (AFY)</b>
Total Demands	655,700	673,600	692,600	712,000	724,900	69,200
<i>AFY = acre-feet per year</i>						
1 Source: City of Los Angeles, Department of Water and Power, 2020 Urban Water Management Plan, Certified May 25, 2021, Exhibits ES-R, ES-S, and ES-T, pages ES-20 through ES-24.						

As shown in **Table XIX-1**, annual water demand within the City is projected to increase over the planning period by between 67,900 AFY and 72,000 AFY. The water demand associated with the change of use proposed by the Project would be expected to represent a negligible portion of this projected increase, as well as total water supplies. Moreover, as also shown in **Table XIX-1**, LADWP projects sufficient water supplies to meet all demands through the planning period under all hydrological conditions. As detailed in **Checklist Section XIV, Population and Housing**, the Project would not result in any direct or indirect population growth. Accordingly, the Project's estimated water demand has been accounted for within LADWP's projections and would not result in an exceedance of the water demand estimates of the 2020 UWMP. As such, the Project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple-dry years. Therefore, impacts would be less than significant and no mitigation measures would be required.

**Mitigation Measures**

None required.

- c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

**Less than Significant 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.

As detailed above, the Project's proposed change of use would be expected to represent an extremely negligible portion of the remaining daily capacity at the HWRP. Therefore, impacts would be less than significant and no mitigation measures would be required.

**Mitigation Measures**

None required.

- 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.** A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste.

Landfill availability is limited by several factors, including: (1) restrictions to accepting waste generated only within a particular landfill's jurisdiction and/or watershed boundary, (2) tonnage permit limitations, (3) types of waste, and (4) operational constraints. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste<sup>59</sup> such as construction and demolition (C&D) waste, yard trimmings, and earth-like waste are disposed of in inert waste landfills. The County continually evaluates landfill disposal needs and capacity through preparation of the Los Angeles County Countywide Integrated Waste Management Plan (CoIWMP) Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity. Based on the most recent 2022 CoIWMP Annual Report, the remaining total disposal capacity for the County's Class III landfills is estimated at 164.21 million tons as of December 31, 2021.<sup>60</sup>

Under state law (AB 939, as amended by AB 341), the City is required by AB 939/AB 341 to divert 75 percent of solid waste generated within the City from landfill disposal. The City's RENEW LA Plan has also set a goal of 90 percent diversion by 2025 and zero waste by 2030.<sup>61</sup> In order to meet diversion requirements and achieve increased diversion goals, the City implements programs that would be implemented at the Project Site such as separate curbside recycling and yard waste/composting bins. Based on the available capacity and the required diversion requirements, operation of the Project is not expected to 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. Therefore, impacts would be less than significant and no mitigation measures would be required.

### **Mitigation Measures**

None required.

#### **e) 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 would be disposed of in accordance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939.

The Project would be consistent with applicable regulation associated with solid waste, as under existing conditions at the building. Specifically, the Project would continue to provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include on-site trash and recycling areas. The Project would generate solid waste that is typical of a medical clinic project and would be required to be consistent with all federal, state, and local statutes and regulations regarding proper

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<sup>59</sup> *Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.*

<sup>60</sup> *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan, 2022 Annual Report, December 2022, Appendix E-2, Table 4: Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County, website: <https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=17450&hp=yes&type=PDF>, accessed December 2024.*

<sup>61</sup> *City of Los Angeles, Bureau of Sanitation, Solid Waste Integrated Resources Plan – A Zero Waste Master Plan, October 2013, Final Adoption, April 2015, available at: <https://www.lacitysan.org/san/sandocview?docname=cnt012522>, accessed December 2024.*

disposal. As discussed under **Question IX(a)**, The use and disposal of hazardous materials associated with operations of the building as a medical clinic and surgery center would not differ dramatically in type and quantity from existing operations as medical offices (e.g., sharps, biohazardous and pharmaceutical waste), none of which are currently considered environmental concerns. Use of these materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, state, and local agencies related to storage, use, and disposal of hazardous materials. Medical waste generated would continue to be managed in accordance with a Medical Waste Management Plan in compliance with California Department of Public Health standards. Medical waste would continue to be transported offsite by a licensed transporter for appropriate disposal on a regular basis. Non-medical waste would be disposed of by hauling companies to the Class III landfills discussed above. The amount of solid waste that would be generated by the Project would be further reduced through source reduction and recycling programs (as discussed above). Therefore, Project impacts would be less than significant and no mitigation measures would be required.

**Mitigation Measures**

None required.

**XX. WILDFIRE**

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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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?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

- a) **Substantially impair an adopted emergency response plan or emergency evacuation plan?**
- 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?**
- 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?**
- 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 Project Site is not in or near a State responsibility area<sup>62</sup> or within a Very High Fire Hazard Severity Zone,<sup>63</sup> nor is the Project Site or surrounding area within a wildland fire hazard area.<sup>64</sup> Therefore, the Project would not result in any potential impacts related to wildfire. No impacts would occur and no mitigation measures would be required.

**Mitigation Measures**

None required.

**XXI. MANDATORY FINDINGS OF SIGNIFICANCE**

	<u>Potentially Significant Impact</u>	<u>Less than Significant with Mitigation Incorporated</u>	<u>Less than Significant Impact</u>	<u>No Impact</u>
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>62</sup> CalFire, Board of Forestry and Fire Protection, State Responsibility Area Viewer, website: <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=468717e399fa4238ad86861638765ce1>, accessed December 2024.

<sup>63</sup> City of Los Angeles Department of City Planning, Zone Information & Map Access System.

<sup>64</sup> City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit D, Selected Wildlife Hazard Areas in the City of Los Angeles, Adopted November 1996.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) **Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

**No Impact.** *State CEQA Guidelines* Section 15065(a) requires a finding of significance if a project "has the potential to substantially degrade the quality of the environment." In practice, this is the same standard as a significant effect on the environment, which is defined in *State CEQA Guidelines* Section 15382 as "a substantial or potentially substantial adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance."

As indicated by the analysis in **Checklist Section IV, Biological Resources**, the Project would not significantly impact biological resources, including candidate, sensitive, or special status species; riparian habitat or other sensitive natural community; state or federally protected wetlands; native resident or migratory wildlife corridors or nursery sites; or protected trees. As such, the Project would not substantially reduce the habitat of fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of a rare or endangered plant or animal. As discussed in **Checklist Sections V, Cultural Resources**, and **VII, Geology and Soils**, the Project would have no impacts on cultural resources, including historical and archaeological resources and human remains; and paleontological resources. Additionally, as detailed in **XVIII, Tribal Cultural Resources**, no potential impacts to tribal cultural resources would occur as the Project does not include demolition, excavation, or grading. As such, the Project would not eliminate important examples of the major periods of California history or prehistory. Therefore, no impacts would occur and no mitigation would be required.

**Mitigation Measures**

None.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

**Less than Significant Impact.** Cumulative impacts refer to two or more individual effects which, when evaluated together, are considerable or would compound or increase other environmental effects. The Project proposes to change the use of the existing 5-story building with attached above-ground parking structure from 5 levels of medical offices to 5 levels of medical clinics including a surgery center in the existing building and to legalize the existing building’s nonconforming FAR. This change would include a General Plan Amendment, Zone Change, and Height District change to change the property’s land use designation from Limited Commercial to Regional Center Commercial and change the property’s zone and height district from CR-1L-O and CR-1VL-O to (T)(Q)C2-2D-O to allow the proposed change of use within the existing building. Construction consists of interior tenant improvements only and there is no new proposed addition/no new floor area in conjunction with the requested entitlements. There are no changes to the existing attached parking garage. Construction consists of interior tenant improvements. As discussed throughout this IS/ND, the Project has very limited potential to result in any physical impacts to the environment and negligible, if any, changes to potential environmental impacts compared to existing conditions. No significant impacts are identified for the Project. In addition, any successive projects of the same type and nature would reflect a development that is consistent with the underlying land use designation and the LAMC, and thus would be subject to the same regulations and requirements, including development standards and conditions of approval. The impacts of each subsequent project would be mitigated if necessary, and thus will not result in a cumulative impact. As such, the Project would not have the potential to contribute to significant cumulative impacts. Therefore, cumulative impacts would be less than significant, and no further mitigation would be required.

#### **Mitigation Measures**

None required.

- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

**Less than Significant Impact with Mitigation.** As required by *State CEQA Guidelines* Section 15065(a)(4), a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to cause substantial adverse effects on human beings, either directly or indirectly. Under this standard, a change to the physical environment that might otherwise be minor must be treated as significant if people would be significantly affected. This factor relates to adverse changes to the environment of human beings generally, and not to effects on particular individuals. While changes to the environment that could indirectly affect human beings would be represented by all of the designated CEQA issue areas, those that could directly affect human beings include air quality, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services, transportation, utilities and service systems, and wildfire. These changes are addressed in **Checklist Sections III, Air Quality; VII, Geology and Soils; VIII, Greenhouse Gas Emissions; IX, Hazards and Hazardous Materials;**

**X, Hydrology and Water Quality; XIII, Noise; XIV, Population and Housing; XV, Public Services; XVII, Transportation; XIV, Utilities and Service Systems; and XX, Wildfire** of this IS/ND.

As detailed in these sections, all potential impacts of the Project have been determined to be less than significant. Through compliance with existing regulations, the Project would not have the potential to result in substantial adverse impacts on human beings, either directly or indirectly. Therefore, impacts would be less than significant with mitigation and no further mitigation measures would be required.

**Mitigation Measures**

None required.



## TRANSPORTATION STUDY ASSESSMENT Department of Transportation

### PURPOSE

The Department of Transportation (LADOT) Referral Form (hereafter referred to as Referral Form) serves as an initial assessment to determine whether a project requires a Transportation Assessment. A Planning case must be filed with Los Angeles City Planning prior to submitting this Referral Form to LADOT.

### GENERAL INFORMATION

- All new school projects, including by-right projects, must contact LADOT for an assessment of the school's proposed drop-off/pick-up scheme and to determine if any traffic controls, school warning and speed limit signs, school crosswalk and pavement markings, passenger loading zones and school bus loading zones are needed.
- Unless exempted, projects located within a Transportation Specific Plan area may be required to pay a traffic impact assessment fee, regardless of the need to prepare a Transportation Assessment.
- Pursuant to LAMC Section 19.15 of Chapter 1, a review fee payable to LADOT may be required to process this form. The applicant should contact the appropriate [LADOT Development Services Office](#) to arrange payment.
- LADOT's Vehicle Miles Traveled (VMT), VMT Calculator, and VMT Calculator User Guide can be found at <http://ladot.lacity.org>.
- A transportation study is not needed for the following project applications:
  - Ministerial / by-right projects
  - Discretionary projects limited to a request for change in hours of operation
  - Tenant improvements within an existing shopping center for change of tenants
  - Any project only installing a parking lot or parking structure
  - Time extension
  - Single-family home (unless part of a subdivision)
- This Referral Form is not intended to address the project's site access plan, driveway dimensions and location, internal circulation elements, dedication and widening, and other issues. These items require separate review and approval by LADOT.

## SUBMITTAL REQUIREMENTS

When submitting this Referral Form to LADOT, complete and include a copy of the documents listed below:

- City Planning Application (CP13-7771.1)
- A fully dimensioned Site Plan showing all existing and proposed structures, parking and loading areas, driveways, as well as on-site and off-site circulation
- If filing for purposes of Project Review, the Project Review Supplemental Application (CP13-2150)
- Project-specific VMT Calculator analysis results
- Route this Referral Form for processing to the appropriate [LADOT Development Services Office](#) as follows (see this [map](#) for geographical reference):

## LADOT DEVELOPMENT SERVICES DIVISION OFFICES

Metro	West LA	Valley
100 S. Main St, 9th Floor Los Angeles, CA 90012 ladot.devreview.cen@lacity.org	7166 W. Manchester Blvd Los Angeles, CA 90045 ladot.devreview.wla@lacity.org	6262 Van Nuys Blvd, 3rd Floor Van Nuys, CA 91401 ladot.devreview.sfv@lacity.org

## THIS SECTION TO BE COMPLETED BY APPLICANT

### PROJECT INFORMATION

Case Number: CPC-2023-5444-GPA-ZC-HD

Address: 640 S. San Vicente Boulevard, Los Angeles 90048

Project Description: 68,500 sf 5 story bldg coversion from med/dental office to clinic

Seeking Existing Use Credit (will be calculated by LADOT):  YES  NO  UNSURE

Applicant Name: Land of the Free, LP, Traffic: Liz Fleming

Email: liz@overlandtraffic.com

Phone: 310 545-1235

## PROJECT REFERRAL TABLE

	Land Use (list all)	Size/Unit	Daily Trips <sup>1</sup>
Proposed <sup>1</sup>	Medical & Dental Clinics, Surgery Ctr	68,500 sf	
	Total Trips <sup>1</sup> :		1,942

### THIS SECTION TO BE COMPLETED BY PLANNING STAFF ONLY

Planning Staff Name: Griselda Gonzalez

Phone: 213-978-1414 email: griselda.gonzalez@lacity.org

Signature: Griselda Gonzalez Digitally signed by Griselda Gonzalez  
Date: 2024.03.18 09:38:06 -07'00' Date: 3/18/24

- a. Does the proposed project involve a discretionary action?  YES  NO
- b. Would the proposed project generate 250 or more daily vehicle trips<sup>2</sup>?  YES  NO
- c. If the project is replacing an existing number of residential units with a smaller number of residential units, is the proposed project located within one-half mile of a heavy rail, light rail, or bus rapid transit station<sup>3</sup>?  YES  NO

If **YES** to **a.** and **b.** or **c.**, or to **all** of the above, the Project must be referred to LADOT for further assessment.

<sup>1</sup> Qualifying Existing Use to be determined by LADOT staff on following page, per LADOT's TAG.

<sup>2</sup> To calculate the project's total daily trips, use the VMT Calculator. Under "Project Information", enter the project address, land use type, and intensity of all proposed land uses. Select the '+' icon to enter each land use. After you enter the information, copy the 'Daily Vehicle Trips' number into the total trips in this table. Do not consider any existing use information for screening purposes. For additional questions, consult LADOT's [VMT Calculator User Guide](#) and the LADOT TAG (available on the LADOT website).

<sup>3</sup> Relevant transit lines include Metro Red, Purple, Blue, Green, Gold, Expo, Orange, and Silver line stations; and Metrolink stations.

**THIS SECTION TO BE COMPLETED BY LADOT**

**PROJECT COMPONENTS**

	Land Use (list all)	Size/Unit	Daily Trips
<b>Proposed</b>	Medical/Dental Clinic and Surgery Center	68,500 sf	
	<b>Total Trips:</b>		<b>1,942</b>
<b>Existing</b>	Medical/Dental Office	68,500 sf	
	<b>Total Trips:</b>		<b>1,852</b>
	<b>Net Increase / Decrease (+ or -)</b>		<b>90</b>

- a. Is the project a single retail use that is less than 50,000 square feet?  YES  NO
- b. Would the project generate a net increase of 250 or more daily vehicle trips?  YES  NO
- c. Would the project generate a net increase of 500 or more daily vehicle trips?  YES  NO
- d. Would the project result in a net increase in daily VMT?  YES  NO
- e. If the project is replacing an existing number of residential units with a smaller number of residential units, is the proposed project located within one-half mile of a heavy rail, light rail, or bus rapid transit station?  YES  NO
- f. Does the project trigger Project Review (LAMC Section 16.05 of Chapter 1)?  YES  NO
- g. Project size:  YES  NO
  - i. Would the project generate a net increase of 1,000 or more daily vehicle trips?  YES  NO
  - ii. Is the project's frontage 250 linear feet or more along a street classified as an Avenue or Boulevard per the City's General Plan?  YES  NO
  - iii. Is the project's building frontage encompassing an entire block along a street classified as an Avenue or Boulevard per the City's General Plan?  YES  NO

## VMT ANALYSIS (CEQA REVIEW)

If **YES** to a. and **NO** to e. a VMT analysis is **NOT** required.

If **YES** to both b. and d.; or to e. a VMT analysis **is** required.

## ACCESS, SAFETY, AND CIRCULATION ASSESSMENT (CORRECTIVE CONDITIONS)

If **YES** to c., a project access, safety, and circulation evaluation may be required.

If **YES** to f. and either g.i., g.ii., or g.iii., an access assessment may be required.

## LADOT COMMENTS:

*Please note that this form is not intended to address the project's site access plan, driveway dimensions and location, internal circulation elements, dedication and widening, and other issues. These items require separate review and approval by LADOT. Qualifying Existing Use to be determined per LADOT's TAG.*

## LADOT ASSESSMENT QUESTIONS

Specific Plan with Trip Fee or TDM Requirements:  YES  NO

Fee Calculation Estimate: \_\_\_\_\_

VMT Analysis Required:  YES  NO

Access, Safety, and Circulation Evaluation Required:  YES  NO

Access Assessment Required:  YES  NO

Prepared by DOT Staff Name: Eileen Hunt

Phone: 213-972-8481

Signature:  Digitally signed by Eileen Hunt  
Date: 2024.04.05 08:28:51 -07'00'

Date: 4/5/24



## TREE DISCLOSURE STATEMENT

Los Angeles Municipal Code (LAMC) Section 46.00 requires disclosure and protection of certain trees located on private and public property, and that they be shown on submitted and approved site plans. Any discretionary application on a property that includes changes to the building footprint or any other change to the areas of the property not currently built upon or paved, including demolition, grading, or fence permit applications, or any discretionary change that could potentially remove or affect trees or shrubs, shall provide a Tree Disclosure Statement completed and signed by the Property Owner.

If the Tree Disclosure Statement indicates that there are any protected trees or protected shrubs on the project site and/or any trees within the adjacent public right-of-way that may be impacted or removed as a result of the project, a Tree Report ([CP-4068](#)) will be required, and the field visit must be conducted by a qualified Tree Expert, prepared and conducted within the last 12 months.

**Property Address:** 640 S San Vicente Blvd

**Date of Field Visit:** N/A

*Does the property contain any of the following protected trees or shrubs?*

- Yes** (Mark any that apply below)
  - Oak, including Valley Oak (*Quercus lobota*) and California Live Oak (*Quercus agrifolia*) or any other tree of the oak genus indigenous to California, but excluding the Scrub Oak
  - Southern California Black Walnut (*Juglans californica*)
  - Western Sycamore (*Platanus racemosa*)
  - California Bay (*Umbellularia californica*)
  - Mexican Elderberry (*Sambucus mexicana*)
  - Toyon (*Heteromeles arbutifolia*)
- No**

*Does the property contain any street trees in the adjacent public right-of-way?*

- Yes**       **No**

*Does the project occur within the Mt. Washington/Glassell Park Specific Plan Area and contain any trees 12 inches or more diameter at 4.5 feet above average natural grade at base of tree and/or is more than 35 feet in height?*

- Yes**       **No**

Does the project occur within the Coastal Zone and contain any of the following trees?

- Yes (Mark any that apply below)
  - Blue Gum Eucalyptus (*Eucalyptus globulus*)
  - Red River Gum Eucalyptus (*Eucalyptus camaldulensis*)
  - Other Eucalyptus species

No

Have any trees or shrubs been removed in the last two years?

- Yes
- No

If Yes, were any protected species (as listed in Ordinance No. 186,873)?

- Yes
- No

If Yes, provide permit information: \_\_\_\_\_

### Tree Expert Credentials (if applicable)

Name of Tree Expert: N/A

Mark which of the following qualifications apply:

- Certified arborist with the International Society of Arboriculture who holds a license as an agricultural pest control advisor
- Certified arborist with the International Society of Arboriculture who is a licensed landscape architect
- Registered consulting arborist with the American Society of Consulting Arborists

Certification/License No.: N/A

### Owner's Declaration

I acknowledge and understand that knowingly or negligently providing false or misleading information in response to this disclosure requirement constitutes a violation of the Los Angeles Municipal Code Section 46.00, which can lead to criminal and/or civil legal action. I certify that the information provided on this form relating to the project site and any of the above trees and/or biological resources is accurate to the best of my knowledge.

Name of the Owner (Print) Jose Nazar

Owner Signature Jose Nazar

Date April 4, 2024

HELIX Environmental Planning, Inc.  
7578 El Cajon Boulevard  
La Mesa, CA 91942  
619.462.1515 tel  
619.462.0552 fax  
[www.helixepi.com](http://www.helixepi.com)



June 13, 2024

09127.00001.001

Jose Nazar  
Land of the Free, LP  
640 S. San Vicente Boulevard, Penthouse  
Los Angeles, CA 90048

Subject: Analysis of the Indirect Impacts of the 640 S. San Vicente Boulevard Project,  
City and County of Los Angeles, California

## INTRODUCTION

In response to a request by Los Angeles City Planning for a letter addressing any potential effects from the proposed project at 640 S. San Vicente Boulevard (APN: 5510-022-054) HELIX Environmental Planning Inc. (HELIX) has prepared the following analysis of indirect impacts from the proposed project on the 6<sup>th</sup> Street-Orange Street Multi-Family Residential Historic District (Historic District) and 6617 W. Orange Street, all in the City and County of Los Angeles, California (Figure 1).

The proposed project is immediately adjacent to the west boundary of the Historic District, the boundaries of which are as follows: on the west side from the parcel at the northeast corner of the alleyway east of S. San Vicente Boulevard and W. 6<sup>th</sup> Street, southward along the alley (excluding 6617 W. Orange Street), east on W. Orange Street and then south on S. Sweetzer Avenue; on the south side by the parcels on the south side of Orange Street; on the east side by the parcels on the west side of S. Hayworth Avenue (with a few parcels excluded); and on the north side by the parcels on the north side of W. 6<sup>th</sup> Street. Additionally, the project is immediately adjacent to 6617 W. Orange Street. Both the Historic District and 6617 W. Orange Street were evaluated via survey in 2014 by SurveyLA, and both are *historical resources* for the purposes of the California Environmental Quality Act (CEQA).<sup>1</sup> The proposed project would (1) change the use of the property from medical offices to medical clinics; (2) remodel and alter the interior; and (3) retain the exterior as is.

The Historic District is significant as an excellent example of a 1920s-1950s multi-family residential district containing a mix of multi-family property types, from duplexes to apartment houses, in a variety of revival architectural styles and has a period of significance from 1915 to 1954.<sup>2</sup> The property at 6617 W. Orange Street is significant as an "Excellent example of a Stucco Box apartment house in the

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<sup>1</sup> California Public Resources Code §5021.1(k) (2022). And California Environmental Quality Act § 15064.5.

<sup>2</sup> "Historic District – 6<sup>th</sup> Street-Orange Street Multi-Family Residential Historic District," HistoricPlacesLA.com. [Historic Places Los Angeles - Resource Report \(lacity.org\)](https://www.historicplacesla.com/), accessed May 23, 2024.

Wilshire area” and has a period of significance of 1962.<sup>3</sup> This analysis includes (1) a description and significance summary of the two historical resources; and (2) an analysis of the potential impact of the proposed project on the historical resources. The analysis of indirect impacts is guided by the *Secretary of the Interior’s Standards for Rehabilitation* Number 9, as that standard addresses potential impacts of new additions, exterior alterations, or related new construction on historic materials, features, and spatial relationships that characterize the historical resources.

This memorandum was authored by HELIX senior architectural historian Nelson White who exceeds the Secretary of the Interior’s Professional Qualifications Standards for architectural history and history (as defined in 36 Code of Federal Regulations Part 61).

The proposed project complies with all ten of the applicable Rehabilitation Standards. Thus, per section §15064.5(b)(3) of the CEQA Statute and Guidelines the proposed project’s impacts, particularly in the spatial relationship with the two historical resources, are mitigated to a level less than a significant impact on the historical resources.

## REGULATORY SETTING

### Significance Thresholds

The thresholds for determining the significance of environmental effects on the identified historical resource (6th Street-Orange Street Multi-Family Residential Historic District) are derived from the CEQA Guidelines, as defined in California Code of Regulations (CCR) Section §15064.5, and the *L.A. CEQA Thresholds Guide*.<sup>4</sup> Pursuant to this guidance, a project that would physically detract, either directly or indirectly, from the integrity and significance of a historical resource such that its eligibility for listing in the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR) or as a Los Angeles Historic Cultural Monument (HCM) would no longer be maintained, is considered a project that would result in a significant impact on the historical resource. Adverse impacts, which may or may not rise to a level of significance, result when one or more of the following occurs to a historical resource: demolition, relocation, conversion, rehabilitation, alteration, or new construction on the site or in the vicinity.

### CEQA Guidelines

According to the CEQA Guidelines, Section §15064.5(b), a project involves a “substantial adverse change” in the significance of a historical resource when one or more of the following occurs:

1. Substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

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<sup>3</sup> “Historic Resource – 6617 W. Orange Street,” HistoricPlacesLA.com. [Historic Places Los Angeles - Resource Report \(lacity.org\)](https://historicplacesla.com/historic-places-los-angeles-resource-report/), accessed May 23, 2024.

<sup>4</sup> California Code of Regulations, Title 14, Chapter 3, *Determining the Significance of Impacts to Archeological and Historical Resources*. [Cal. Code Regs. Tit. 14, § 15064.5 - Determining the Significance of Impacts to Archeological and Historical Resources | State Regulations | US Law | LII / Legal Information Institute \(cornell.edu\)](#), accessed on January 24, 2024; and City of Los Angeles, *L.A. CEQA Thresholds Guide: Your Resource for Prepping CEQA Analysis in Los Angeles*, 2006.

2. The significance of a historical resource is materially impaired when a project:
  - a. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR; or
  - b. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section §5020.1(k) of the PRC or its identification in a historical resources survey meeting the requirements of Section §5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
  - c. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA.

Likewise, the *L.A. CEQA Thresholds Guide* states that “a project would normally have a significant impact on historical resources if it would result in a substantial adverse change in the significance of a historical resource,” as defined in CEQA Guidelines Section §15064.5, or when one or more of the following occurs:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource that does not conform to the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (“Standards”); or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

Under CEQA, a proposed development must be evaluated to determine how it may impact the potential eligibility of a structure(s) or a site for designation as a historical resource.

## RESOURCE DESCRIPTION

### **6<sup>th</sup> Street-Orange Street Multi-Family Residential Historic District**

The proposed project is immediately adjacent to the 6<sup>th</sup> Street-Orange Street Multi-Family Residential Historic District, which was identified by SurveyLA in 2014. SurveyLA assigned the Historic District California Historical Resource Status Codes (Status Codes) 3S, 3CS, 5S3, meaning that through survey evaluation the Historic District appears eligible for the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), and for local listing (Los Angeles Historic-Cultural Monument - HCM). The Historic District possesses historic significance in the area of Architecture as (1) “an excellent example of a 1920s to 1950s Period Revival neighborhood containing almost all multi-family residences, in the Spanish Colonial Revival, French Revival, Mediterranean Revival and Minimal Traditional styles” and it possesses significance in the area of Community Planning and Development as (2) an “excellent example of a 1920s-1950s multi-family residential district containing a mix of

multi-family property types, from duplexes to apartment houses.”<sup>5</sup> The Historic District consists of 221 parcels developed with two-story, multi-family residences along 6<sup>th</sup> Street and W. Orange Street. Original concrete sidewalks, uniform setbacks, driveways with curb cuts, detached garages, and front lawns further characterize the Historic District.<sup>6</sup> Based on the significant historical associations, the 6<sup>th</sup> Street-Orange Street Multi-Family Residential Historic District is a historical resource for the purposes of CEQA.<sup>7</sup>

## 6617 W. Orange Street

The proposed project is also immediately adjacent to 6617 W. Orange Street, to which iSurveyLA assigned Status Codes 3CS and 5S3 in 2014, meaning that through survey evaluation the property appears eligible for the CRHR and for local listing as an HCM. The property possesses historic significance in the area of Community Planning and Development as an “excellent example of a Stucco Box apartment house in the Wilshire area, with smooth stucco wall surfaces, a decorative grill, no fenestration on the primary façade, and an arched, tiled entry. Due to door replacement, the property does not retain sufficient integrity for listing in the NRHP.”<sup>8</sup> Its period of significance is 1962. Based on the significant historical association, 6617 W. Orange Street is a historical resource for the purposes of CEQA.<sup>9</sup> The building is three stories and occupies the majority of the parcel.

## INDIRECT IMPACT ANALYSIS

### Project Description

The proposed project would change the use of and renovate the existing five-story commercial building.

- Change of use of the property from medical offices to
  - 1<sup>st</sup> Level – surgery center
  - 2<sup>nd</sup> – 5<sup>th</sup> Levels – clinic<sup>10</sup>
- Remodel and alter the interior<sup>11</sup>
- Retain the exterior as is.<sup>12</sup>

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<sup>5</sup> Architectural Resources Group, *Historic Resources Survey Report: Wilshire Community Plan Area, Appendix C: Historic Districts and Planning Districts and Multi-Property Resources*, January 2015, 32-33.

<sup>6</sup> Architectural Resources Group, 32.

<sup>7</sup> California Public Resources Code § 5021.1(k) (2022). And California Environmental Quality Act § 15064.5

<sup>8</sup> Architectural Resources Group, *Historic Resources Survey Report: Wilshire Community Plan Area, Appendix A: Individual Properties*, January 2015, 170.

<sup>9</sup> California Public Resources Code § 5021.1(k) (2022). And California Environmental Quality Act § 15064.5

<sup>10</sup> Otoneil Solis, Architectural drawings for 640 S. San Vicente Avenue. 2023

<sup>11</sup> Otoneil Solis, Architectural drawings for 640 S. San Vicente Avenue. 2023

<sup>12</sup> Otoneil Solis, Architectural drawings for 640 S. San Vicente Avenue. 2023

## Rehabilitation Standards Analysis

### Rehabilitation Standard No. 9: Compatibility of Planned New Construction with the Historic Preservation Overlay Zone (HPOZ)

This analysis uses Rehabilitation Standards No. 9 because it addresses the potential impacts of new additions, exterior alterations, or related new construction on historic materials, features, and spatial relationships that characterize the historical resources.

The remainder of the Rehabilitation Standards (Nos. 1, 2 and 4-8) are not applicable to the analysis because they address potential physical impacts resulting from alterations to a building that will retain at least part of its historic fabric but, the project does not directly involve a historical resource. Likewise, Standard No. 3 was not used because it addresses creating a false sense of history through stylistic aspects of building design. However, the proposed project does not directly involve a historical resource and is outside of the Historic District; thus, its stylistic design would not have an impact. Standard No. 10 was not used because the proposed project is located outside the Historic District and therefore removal would not impact the essential form and integrity of the Historic District. The methodology for this Impacts Analysis complies with best professional practices as well as the *L.A. CEQA Thresholds Guide*.

**Rehabilitation Standard No. 9:** New additions, exterior alterations, or related new construction would not destroy historic materials, features, and spatial relationships that characterize the property. The new work would be differentiated from the old and would be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

**Discussion:** As designed, the proposed project complies with Rehabilitation Standard No. 9. As detailed in the descriptions of the affected resource and proposed projects, new construction at 640 S. San Vicente Boulevard would be limited to the interior. Its existing appearance, size, shape, and massing would remain as is. Existing views and sightlines within and from the Historic District would remain unchanged. Therefore, the proposed project would not result in altered spatial relationships between it and 6617 W. Orange Street and the Historic District.

## CONCLUSION

The proposed project would change the use of and renovate the interior of an existing five story commercial building, which is adjacent to 6617 W. Orange Street and the 6<sup>th</sup> Street-Orange Street Multi-Family Residential Historic District, both of which are historical resources for the purposes of CEQA. Based on this analysis, the new construction would comply with Rehabilitation Standard No. 9, which addresses potential indirect impacts to the spatial relationships of a historical resource and its component features. The proposed project is compatible with the two historical resources in that the existing scale would remain and therefore there would be no change in the spatial relationships within and between the historical resources and the project site. Therefore, the proposed project complies with the applicable Secretary of the Interior's Standards for Rehabilitation, which is one of the four sets of standards comprising *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*.

The proposed project complies with all ten of the applicable Rehabilitation Standards. Thus, per section §15064.5(b)(3) of the CEQA Statute and Guidelines the proposed project impacts, particularly in the spatial relationship of the two historical resources, are mitigated to a level less than a significant impact.

Sincerely,

Nelson White, M.S.H.P.  
Senior Architectural Historian



**Figure 1.** Aerial image showing the project site in relation to the two historical resources: 6617 W. Orange Street and the 6<sup>th</sup> Street-Orange Street Multi-Family Residential Historic District

## California Department of Transportation

DISTRICT 7  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 407-6607  
FAX (213) 897-1397  
TTY 711  
[www.dot.ca.gov](http://www.dot.ca.gov)



November 17, 2025

Ricardo Vazquez  
City of Los Angeles  
200 North Spring Street, Room 621  
Los Angeles, California 90012

RE: 640 South San Vicente Boulevard  
SCH# 2025101071  
GTS# 07-LA-2025-04936

Dear Roland Jen,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The City of Los Angeles is proposing to change the use of the existing 68,500 square-foot, 5-story building from medical offices to medical clinics including a 9,996 square-foot surgery center. This change would include a General Plan Amendment, Zone Change, and Height District change to change the property's land use designation from Limited Commercial to Regional Center Commercial, and change the property's zone and height district from CR-1L-O and CR-1VL-O to (T)(Q)C2-2D-O to allow the proposed change of use and to legalize the existing building's nonconforming FAR. Construction consists of interior tenant improvements only. The attached parking garage structure will remain as-is and there is no new floor area to the existing building proposed as part of the requested entitlement.

The nearest State facility is I-10 and SR-47. After reviewing the Mitigated Negative Declaration (MND), Caltrans has the following comments:

Caltrans recommends limiting large truck travel and construction traffic to off-peak commute hours. A permit for any heavy construction equipment and/or materials that require the use of oversized transport vehicles on State highways. If construction traffic

Ricardo Vazquez  
November 17, 2025  
Page 2 of 2

is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing potential impacts for Caltrans review.

Should you have any questions, please feel free to contact Nestor Lemus, the project coordinator, at [Nestor.Lemus@dot.ca.gov](mailto:Nestor.Lemus@dot.ca.gov) and refer to GTS # 07-LA-2025-04936.

Sincerely,



MIYA EDMONSON  
LDR/CEQA Branch Chief

cc: State Clearinghouse

# Memorandum

**DATE:** December 11, 2025

**TO:** Valentina Knox-Jones  
200 N. Spring Street, Room 621  
Los Angeles, CA 90012  
(213) 978-1741  
valentina.knox.jones@lacity.org

**FROM:** Lainie Herrera, Senior Project Manager  
EcoTierra Consulting

**RE:** Response to Comments for the 640 S. San Vicente Medical Building Project Initial Study

---

This memorandum provides responses to the comment letter received on the Initial Study/ Negative Declaration (IS/ND) prepared for the 640 S. San Vicente Medical Building Project. Responses presented in this memo focus only on those comments which bear a direct relationship to environmental issues discussed in the IS/ND, as required under the California Environmental Quality Act (CEQA). Some comments provide opinion pertaining to matters not germane to the environmental analysis presented in the IS/ND. Where this occurs, such comments are acknowledged only and no responses to opinions is provided or required by the CEQA.

The IS/ND for the 640 S. San Vicente Medical Building Project ("Project") was circulated for public comment from October 23, 2025 through November 24, 2025. One written comment letter was received, which is attached, and the response follows.

## California Department of Transportation

DISTRICT 7  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 407-6607  
FAX (213) 897-1397  
TTY 711  
[www.dot.ca.gov](http://www.dot.ca.gov)



November 17, 2025

Ricardo Vazquez  
City of Los Angeles  
200 North Spring Street, Room 621  
Los Angeles, California 90012

RE: 640 South San Vicente Boulevard  
SCH# 2025101071  
GTS# 07-LA-2025-04936

Dear Roland Jen,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The City of Los Angeles is proposing to change the use of the existing 68,500 square-foot, 5-story building from medical offices to medical clinics including a 9,996 square-foot surgery center. This change would include a General Plan Amendment, Zone Change, and Height District change to change the property's land use designation from Limited Commercial to Regional Center Commercial, and change the property's zone and height district from CR-1L-O and CR-1VL-O to (T)(Q)C2-2D-O to allow the proposed change of use and to legalize the existing building's nonconforming FAR. Construction consists of interior tenant improvements only. The attached parking garage structure will remain as-is and there is no new floor area to the existing building proposed as part of the requested entitlement.

The nearest State facility is I-10 and SR-47. After reviewing the Mitigated Negative Declaration (MND), Caltrans has the following comments:

Caltrans recommends limiting large truck travel and construction traffic to off-peak commute hours. A permit for any heavy construction equipment and or materials that require the use of oversized transport vehicles on State highways. If construction traffic

Ricardo Vazquez  
November 17, 2025  
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is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing potential impacts for Caltrans review.

Should you have any questions, please feel free to contact Nestor Lemus, the project coordinator, at [Nestor.Lemus@dot.ca.gov](mailto:Nestor.Lemus@dot.ca.gov) and refer to GTS # 07-LA-2025-04936.

Sincerely,



MIYA EDMONSON  
LDR/CEQA Branch Chief

cc: State Clearinghouse

**Letter No. 1****California Department of Transportation****District 7****100 S Main Street, MS 16****Los Angeles, CA 90012****Response No. 1:**

This comment letter summarizes the Project description and states:

*The nearest State facility is I-10 and SR-47. After reviewing the Mitigated Negative Declaration (MND), Caltrans has the following comments:*

*Caltrans recommends limiting large truck travel and construction traffic to off-peak commute hours. A permit for any heavy construction equipment and or materials that require the use of oversized transport vehicles on State highways. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing potential impacts for Caltrans review.*

The Project is not anticipated to require any heavy construction equipment or construction truck trips, as the Project's construction activity is limited to interior tenant improvements. Furthermore, such tenant improvements would be conducted over time as tenants move out of and into the building, and would not occur all at once, and therefore no construction traffic is expected to be required for the Project. Trucks traveling to the Project for operational purposes such as deliveries would typically occur in off-peak times.