

Agenda Item 9(f)  
SMMC  
5/22/17

CITY OF LOS ANGELES  
OFFICE OF THE CITY CLERK  
ROOM 395, CITY HALL  
LOS ANGELES, CALIFORNIA 90012  
CALIFORNIA ENVIRONMENTAL QUALITY ACT  
PROPOSED MITIGATED NEGATIVE DECLARATION

City of Los Angeles  
M 17-050-PL  
110  
Created by  
Date: 4-23-17

<b>LEAD CITY AGENCY</b> City of Los Angeles	<b>COUNCIL DISTRICT</b> 14
<b>PROJECT TITLE</b> El Sereno	<b>CASE NO.</b> ENV-2015-1918-MND, VTT-73531, APCE 2015-2048-ZC-ZAD

**PROJECT LOCATION**  
2520, 2532, 2608, 2668, North Eastern Avenue and 2647, 2649, 2651 Lombardy Boulevard, Los Angeles, California, 90032

**PROJECT DESCRIPTION**  
The Project site includes three contiguous infill lots totaling approximately 218,270 square feet, located at the south corner of Eastern Avenue and Lombardy Boulevard in the Northeast Los Angeles Community Plan Area of the City of Los Angeles. The land use designation for the Project site is Low Residential, and the Project site is zoned [Q]R1-1D and [Q]RD6-1D. The Project includes development of the Project site with 42 single-family residential homes. Each house would have 3-4 bedrooms and a two-car garage. The homes would range in size from approximately 1,729 square feet to 2,279 square feet. In order to implement the Project, the Project Applicant is requesting approval of the following discretionary actions from the City: 1) Vesting Tract Map (VTT) for Small Lot Purposes per LAMC Section 17.03 – Request is for a Vesting Tentative Tract Map to create forty-two (42) single-family lots in accordance with the Small Lot Subdivision Ordinance No. 176,354 in the Northeast Los Angeles Community Plan; 2) Tree Removal Permit – Request is authorization from the Board of Public Works or the Advisory Agency to allow for the removal of up to 39 protected trees pursuant to LAMC Section 17.05R1(b); 3) Vesting Zone Change (ZC) per LAMC Section 12.32 – Request to permit a change of zone from [Q]R1-1D and [Q] RD6-1D to [T][Q]RD5-1D; 4) Zoning Administrator's Determination (ZAD) per LAMC Section 12.24 X.26 – Request is to allow fifty-four (54) walls varying in height from 3.5 feet to 6.0 feet in lieu of the maximum of two (2) 10-foot retaining walls otherwise required in LAMC Section 12.21 C.8(a); and 5) Haul Route Approval from the Board of Building and Safety Commission or Advisory Agency.

**NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY**  
Clearwater Communities, LLC  
4685 MacArthur Court, Suite 375  
Newport Beach, CA 92660

**FINDING:**  
The City Planning Department of the City of Los Angeles has Proposed that a mitigated negative declaration be adopted for this project because the mitigation measure(s) outlined on the attached page(s) will reduce any potential significant adverse effects to a level of insignificance  
(CONTINUED ON PAGE 2)

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED.

Any written comments received during the public review period are attached together with the response of the Lead City Agency. The project decision-maker may adopt the mitigated negative declaration, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

<b>NAME OF PERSON PREPARING THIS FORM</b> Gregory S Shoop	<b>TITLE</b> City Planner	<b>TELEPHONE NUMBER</b> 213-978-7243
<b>ADDRESS</b> 200 N. SPRING STREET, 6th FLOOR LOS ANGELES, CA. 90012	<b>SIGNATURE (Official)</b> Becky Lamb	<b>DATE</b> APRIL 26, 2017

## AESTHETICS

### 1-1: *Non-Protected Trees*

- Prior to issuance of any permit related to development of the Project, a plot plan shall be prepared for the Project, indicating the location, size, type, and general condition of all existing trees on the Project site and within the adjacent public right(s)-of-way.
- All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the Project site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net new trees located within the parkway of the adjacent public-right(s)-of-way may be counted toward replacement tree requirements.
- Removal or planting of any tree in the public right-of-way shall require approval of the Board of Public Works. All trees in the public right-of-way shall be provided in the current standards of the Urban Forestry Division of the Department of Public Works, Bureau of Street Services.

### 1-2 *Protected Trees*

- All protected tree removals shall require approval from the Board of Public Works.
- A Tree Report shall be submitted to the Urban Forestry Division of the Bureau of Street Services, Department of Public Works, for review and approval prior to implementation of the Report's recommended measures.
- According to the City's Protected Tree Ordinance, a minimum of four protected trees (a minimum of 15 gallon in size) shall be planted for each protected tree that is removed.. The size of each replacement tree shall measure at least one inch or more in diameter at a point one foot above the base, and not less than seven feet in height, measured from the base.
- In consultation with the Division of Urban Forestry, twenty-five percent of the protected trees removed shall be replaced with 15-gallon *Juglans californica*.
- The location of the trees planted for the purposes of replacing a removed protected tree shall be clearly indicated on the required landscape plan, which shall also indicate the replacement tree species and further contain the phrase "Replacement Tree" in its description.

### 1-3 *Previously Removed Trees*

- The 8 qualifying previously removed protected trees shall be replaced at a ratio of one *Juglans californica* and three *Quercus* for each of the 8 trees, at a minimum of 15 gallon in size. The specific size and species of the trees to be planted as replacement for the protected trees being removed shall be determined by the Urban Forestry Division.

### 1-4 *All Trees*

- Protection Barrier: A protection barrier shall be installed around the construction area as shown on the map included in the Tree Preservation Report (refer to Appendix A). The barrier shall be 6-foot-high chain-link fencing. Twelve-inch-high silt fence shall be attached to the base of the fence with the bottom edge buried 1-2 inches. The barrier may be placed on the line shown on the map or closer to construction, but not further. The fencing shall be maintained in good repair throughout the duration of the Project, and

shall not be removed, relocated, or encroached upon without permission of the arborist involved.

- **Storage of Materials:** There shall be NO storage of materials or supplies of any kind inside the area of the protection fencing. Concrete and cement materials, block, sand and soil shall not be placed within the drip-line of any tree to remain.
- **Fuel Storage:** Fuel storage shall NOT be permitted within 150 feet of any tree to be preserved. Refueling, servicing and maintenance of equipment and machinery shall NOT be permitted within 150 feet of protected trees.
- **Debris and Waste Materials:** Debris and waste from construction or other activities shall NOT be permitted outside the construction area. Wash down of concrete or cement handling equipment, in particular, shall NOT be permitted within 150 feet of protected trees.
- **Planting near Trees Designated for Protection:** Any digging within designated protection zones shall done using supersonic air directly as the digging medium, by means of a nozzle, whose nominal rated input pressure (available from manufacturer's literature) must not exceed 130 psig (pounds per square inch at gage) unless otherwise approved. Nozzles designed for input above 130 psig can damage fine roots. Air compressors rated between 100 to 125 psig recommended.
- **Grade Changes:** Any grade changes within the protection radius listed should be approved by a Registered Consulting Arborist before construction begins, and precautions taken to mitigate potential injuries. Grade changes can be particularly damaging to trees. Even as little as two inches of fill can cause the death of a tree. Lowering the grade can destroy major portions of a root system.
- **Damages:** Any tree damages or injuries should be reported to the project arborist as soon as possible. Severed roots shall be cut cleanly to healthy tissue, using proper pruning tools. Broken branches or limbs shall be pruned according to International Society of Arboriculture Pruning Guidelines and ANSI A-300 Pruning Standards.
- **Preventive Measures:** Pruning of the tree canopies and branches should be done at the direction of the project arborist to remove any dead or broken branches, and to provide any necessary clearances for the construction work or equipment.

## AIR QUALITY

- 3-1:** All off-road construction equipment greater than 50 hp shall meet U.S. EPA Tier 4 emission standards, where available, to reduce NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions at the Project site. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- 3-2:** Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained, the Lead Agency shall require trucks that meet U.S. EPA 2007 model year NO<sub>x</sub> emissions requirements.
- 3-3:** At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier

specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided.

- 3-4: Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at: <http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-dieselenines&parent=vehicle-engine-upgrades>.
- 3-5: Construction activities shall comply with SCAQMD Rule 403, including the following measures:
- Apply water to disturbed areas of the site three times a day
  - Require the use of a gravel apron or other equivalent methods to reduce mud and dirt trackout onto truck exit routes
  - Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM generation.
  - Limit soil disturbance to the amounts analyzed in the Final MND.
  - All materials transported off-site shall be securely covered.
  - Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
  - Traffic speeds on all unpaved roads to be reduced to 15 mph or less.

## BIOLOGICAL RESOURCES

- 4-1: To avoid potential significant impacts to nesting birds, including migratory birds and raptors, one of the following shall be implemented by the Project Applicant:
- Conduct vegetation removal associated with construction from September 1<sup>st</sup> through January 31<sup>st</sup>, when birds are not nesting. Initiate grading activities prior to the breeding season (which is generally February 1<sup>st</sup> through August 31<sup>st</sup>) and keep disturbance activities constant throughout the breeding season to prevent birds from establishing nests in surrounding habitat (in order to avoid possible nest abandonment); if there is a lapse in activities of more than five days, pre-construction surveys shall be necessary as described in the bullet below.
- OR...
- Conduct pre-construction surveys for nesting birds if vegetation removal or grading is initiated during the nesting season. A qualified wildlife biologist shall conduct weekly pre-construction bird surveys no more than 30 days prior to initiation of grading to provide confirmation on the presence or absence of active nests in the vicinity (at least 300 to 500 feet around the individual construction site, as access allows). The last survey should be conducted no more than three days prior to the initiation of clearance/construction work. If active nests are encountered, clearing and construction in the vicinity of the nests shall be deferred until the young birds have fledged and there is no evidence of a second attempt at nesting. A minimum buffer of 300 feet (500 feet for raptor nests) or as determined by a qualified biologist shall be

maintained during construction depending on the species and location. The perimeter of the nest-setback zone shall be fenced or adequately demarcated with staked flagging at 20-foot intervals, and construction personnel and activities restricted from the area. Construction personnel should be instructed on the sensitivity of the area. A survey report by the qualified biologist documenting and verifying compliance with the mitigation and with applicable state and federal regulations protecting birds shall be submitted to the City and County, depending on within which jurisdiction the construction activity is occurring. The qualified biologist shall serve as a construction monitor during those periods when construction activities would occur near active nest areas to ensure that no inadvertent impacts on these nests would occur.

## **NOISE**

- 12-1:** The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.
- 12-2:** Two weeks prior to commencement of construction, notification shall be provided to the off-site residential and school uses within 500 feet of the Project site that discloses the construction schedule, including the types of activities and equipment that would be used throughout the duration of the construction period.
- 12-3:** Temporary sound barriers, capable of achieving a sound attenuation of at least 10 dBA (e.g., construction sound wall with sound blankets), and capable of blocking the line-of-sight to the adjacent residences shall be installed as feasible.
- 12-4:** Noise-generating construction equipment operated at the Project Site shall be equipped with effective state-of-the-art noise control devices, i.e., mufflers, lagging, solar power or electric plug-in on-site power generators and/or motor enclosures or other shielding equipment. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.
- 12-5:** All construction areas for staging and warming-up equipment shall be located as far as possible from adjacent residences.
- 12-6:** Portable noise sheds for smaller, noisy equipment, such as air compressors, dewatering pumps, and generators shall be provided where feasible.
- 12-7:** A haul route for exporting cut materials from the site to a nearby landfill that access the San Bernardino and/or Long Beach Freeways should minimize travel on residential streets with sensitive receptors.

## **TRANSPORTATION/TRAFFIC**

### **16-1: Hillside Construction Staging and Parking Plan**

- Prior to the issuance of a grading or building permit, the applicant shall submit a Construction Staging and Parking Plan to the Department of Building and Safety and the Fire Department for review and approval. The plan shall identify where all construction materials, equipment, and vehicles will be stored through the construction phase of the project, as well as where contractor, subcontractor, and laborers will park their

vehicles so as to prevent blockage of two-way traffic on streets in the vicinity of the construction site. The Construction Staging and Parking Plan shall include, but not be limited to, the following:

- No construction equipment or material shall be permitted to be stored within the public right-of-way.
- If the property fronts on a designated Red Flag Street, on noticed "Red Flag" days, all the workers shall be shuttled from an off-site area, located on a non-Red Flag Street, to and from the site in order to keep roads open on Red Flag days.
- During the Excavation and Grading phases, all haul trucks shall be staged on the Project site. The drivers shall be required to follow the designated travel plan or approved Haul Route.
- Truck traffic directed to the project site for the purpose of delivering materials, construction-machinery, or removal of graded soil shall be limited to off-peak traffic hours, Monday through Friday only. No truck deliveries shall be permitted on Saturdays or Sundays.
- All deliveries during construction shall be coordinated so that all vendor/delivery vehicles will stage and make deliveries on the project site, and that a construction supervisor is present at such time.
- A radio operator shall be on-site to coordinate the movement of material and personnel, in order to keep the roads open for emergency vehicles, their apparatus, and neighbors.
- During all phases of construction, all construction vehicle parking and queuing related to the project shall be as required to the satisfaction of the Department of Building and Safety, and in substantial compliance with the Construction Staging and Parking Plan, except as may be modified by the Department of Building and Safety or the Fire Department.

**16-2: Construction Activity Near Schools**

- The Project developer and contractors shall maintain ongoing contact with administrators of the Farmdale Elementary School and the El Sereno Middle School. The administrative offices shall be contacted when demolition, grading and construction activity begin on the Project site so that students and their parents will know when such activities are to occur. The developer shall obtain school walk and bus routes to the schools from either the administrators or from the LAUSD's Transportation Branch (323) 342-1400 and guarantee that safe and convenient pedestrian and bus routes to the school be maintained.
- The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
- There shall be no staging or parking of construction vehicles, including vehicles to transport workers on any of the streets adjacent to the school.
- Due to noise impacts on the schools, no construction vehicles or haul trucks shall be staged or idled on these streets during school hours.

**16-3: Schools affected by Haul Route**

- LADBS shall assign specific haul route hours of operation based upon Farmdale Elementary School and El Sereno Middle School hours of operation.

- Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the school during periods when school is in session especially when students are arriving or departing from the campus.

**16-4: Good Neighbor Construction Practices**

- Whenever possible, construction vehicles should be parked on site to prevent congestion on streets with limited parking.
- When temporarily blocking portions of streets for deliveries of construction materials, a flag person shall be provided to assist with pedestrian and vehicular traffic.
- Street closures shall not take place during peak traffic hours. Any street, sidewalk, or other improvement work shall be conducted in conformance with the latest Manual on Work Area Traffic Control.
- Care shall be taken not to overfill concrete trucks during deliveries. If spills occur, it shall be the responsibility of the concrete company to immediately provide clean up.
- Construction noise shall be kept to a minimum with consideration of the surrounding neighbors. Unnecessary noise such as music shall be kept below legal levels.
- Streets and sidewalks adjacent to construction sites shall be swept free of construction debris at all times.
- Care shall be taken to not interfere with trash pick-up by the Bureau of Sanitation. Construction and delivery vehicles shall be subject to trash pick-up parking restrictions.
- If building materials are to be stored in public right of ways, it shall be by permit from the Department of Public Works, Bureau of Street Services, Investigations and Enforcement Division and shall conform with all applicable rules.
- All construction/demolition activities shall comply with the construction hours in Section 41.40 of the LAMC.

**16-5:** The Project Applicant shall plan construction and construction staging as to maintain pedestrian access to adjacent active land uses throughout all construction phases. This requires the Applicant to maintain adequate and safe pedestrian protection, including physical separation from workspace and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times. Barriers, such as K-Rails, scaffolding, etc., shall be maintained at a height of 8 feet.

# City of Los Angeles

Department of City Planning • Environmental Analysis Section  
City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



## MITIGATED NEGATIVE DECLARATION

### NORTHEAST LOS ANGELES COMMUNITY PLAN AREA

#### El Sereno Project

Case Number: ENV-2015-1918-MND, VTT-73531, APCE-2015-2048-ZC-ZAD

**Project Location:** 2520, 2532, 2608, 2668 North Eastern Avenue and 2647, 2649, 2651 Lombardy Boulevard, Los Angeles, California. 90032

**Council District:** 14

**Project Description:** The Project site includes three contiguous infill lots totaling approximately 218,270 square feet, located at the south corner of Eastern Avenue and Lombardy Boulevard in the Northeast Los Angeles Community Plan Area of the City of Los Angeles. The land use designation for the Project site is Low Residential, and the Project site is zoned [Q]R1-1D and [Q]RD6-1D. The Project includes development of the Project site with 42 single-family residential homes. Each house would have 3-4 bedrooms and a two-car garage. The homes would range in size from approximately 1,729 square feet to 2,279 square feet. In order to implement the Project, the Project Applicant is requesting approval of the following discretionary actions from the City: 1) Vesting Tract Map (VTT) for Small Lot Purposes per LAMC Section 17.03 – Request is for a Vesting Tentative Tract Map to create forty-two (42) single-family lots in accordance with the Small Lot Subdivision Ordinance No. 176,354 in the Northeast Los Angeles Community Plan; 2) Tree Removal Permit - Request is authorization from the Board of Public Works or the Advisory Agency to allow for the removal of up to 39 protected trees pursuant to LAMC Section 17.05R1(b); 3) Vesting Zone Change (ZC) per LAMC Section 12.32 – Request to permit a change of zone from [Q]R1-1D and [Q] RD6-1D to (T)(Q)RD5-1D; 4) Zoning Administrator's Determination (ZAD) per LAMC Section 12.24 X.26 – Request is to allow fifty-four (54) walls varying in height from 3.5 feet to 6.0 feet in lieu of the maximum of two (2) 10-foot retaining walls otherwise required in LAMC Section 12.21 C.8(a); and 5) Haul Route Approval from the Board of Building and Safety Commission or Advisory Agency.

APPLICANT:

Clearwater Communities, LLC  
4685 MacArthur Court, Suite 375  
Newport Beach, CA 92660

PREPARED BY:

CAJA Environmental Services  
11990 San Vicente Boulevard  
Los Angeles, CA 90049

ON BEHALF OF:

The City of Los Angeles  
Department of City Planning  
Environmental Analysis Section

March 2017



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# I. INTRODUCTION

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## Introduction

The subject of this Initial Study/Mitigated Negative Declaration (IS/MND) is the development of 42 single-family residential homes on three contiguous infill lots totaling approximately 218,270 square feet, located at the south corner of Eastern Avenue and Lombardy Boulevard in the Northeast Los Angeles Community Plan Area of the City of Los Angeles (the "City"). The Project Applicant is Clearwater Communities, LLC. A more detailed description of the Project is contained in Section II (Project Description). The City's Department of City Planning is the Lead Agency under the California Environmental Quality Act (CEQA).

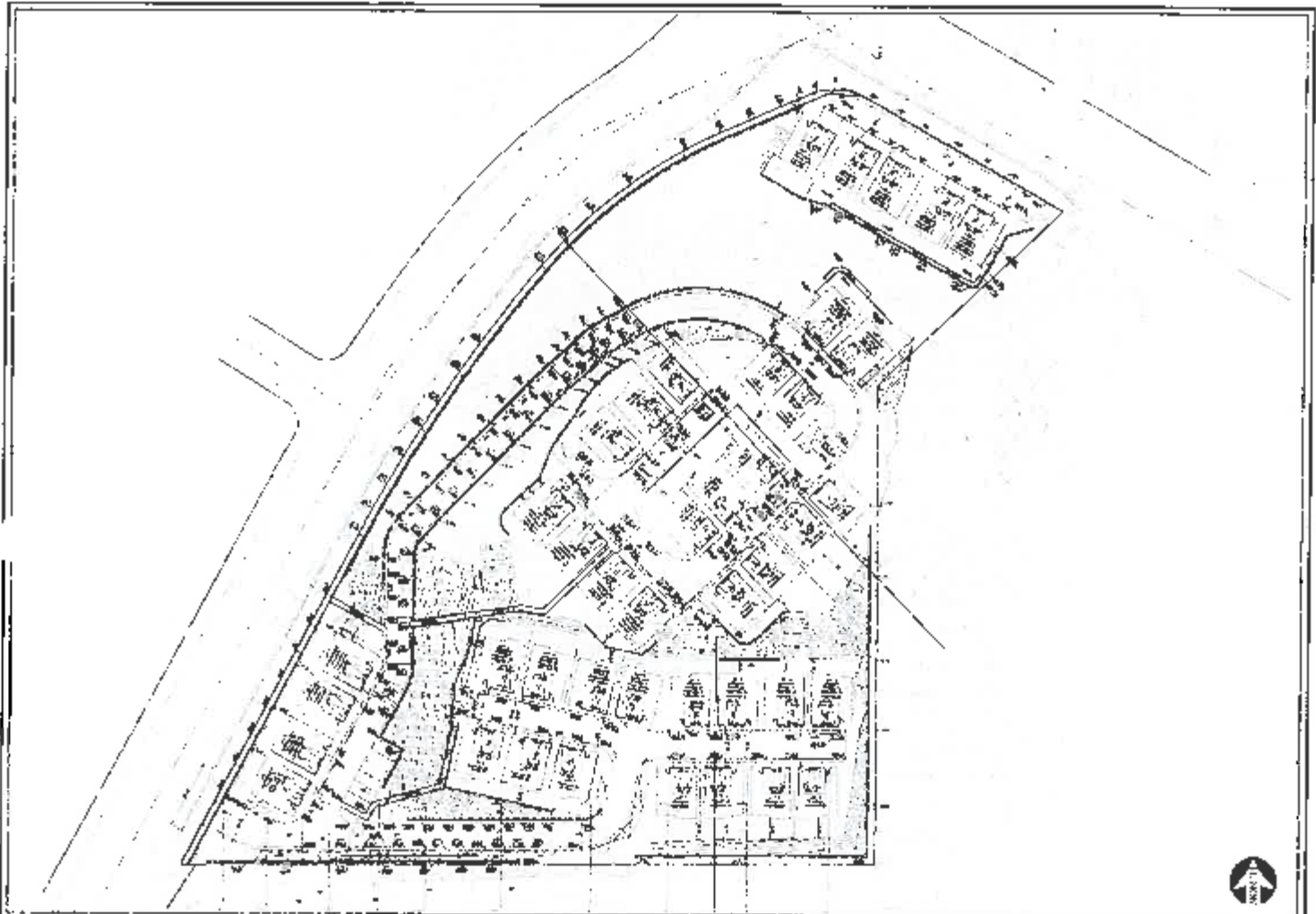
## Background

In June 2016, the City prepared and circulated an IS/MND for development of the Project site with a previous version of the Project. The previous version of the Project included development of the same land uses (single-family residential) and the same number of dwelling units (42 homes), but in a different configuration than what is currently proposed. The previous version of the Project (shown on Figure I-1) would have required the removal of 68 protected trees (of the 102 protected trees on the Project site) and 64 non-protected trees (of the 72 non-protected trees on the site), for a total removal of 132 trees. Comments on the June IS/MND submitted to the City primarily raised concerns about removal of existing trees from the Project site, particularly removal of protected southern black walnut trees (*Juglans californica*). Other prevailing concerns expressed by commenters included the loss of walnut woodland habitat and traffic impacts.

As a result of these concerns, the Project Applicant revised the configuration of the Project to substantially reduce the need for removal of existing trees. The new Project configuration (refer to Figure II-7 in Section II, Project Description) would require the removal of 37 to 39 protected trees (a reduction of approximately 29 trees) and 59 non-protected trees (a reduction of 18 trees), which is a reduction of 6 total trees when compared to the previous version of the Project. As with the previous version of the Project, all trees removed from the Project site would be required by the City to be replaced at a ratio and size specified by the City (i.e., 4:1 for protected trees and 1:1 for non-protected trees).

The change in the configuration of the Project would result in an increase in cut soil at the Project site and export from the Project site than what was considered in the June IS/MND.

The City has updated the June IS/MND to reflect the Project's reconfiguration, tree removal reduction, and increase in soil export during the construction phase. Also, the IS/MND incorporates a Biological Resources Report prepared for the Project that addresses the issue of walnut woodlands, and a new Traffic Study that reflects existing traffic conditions within the Project site area.



### **Project Information**

Project Title: El Sereno Project

Project Location: 2520, 2532, 2608, 2668 North Eastern Avenue and 2647, 2649, 2651 Lombardy Boulevard, Los Angeles, California, 90032

Lead Agency: City of Los Angeles Department of City Planning

Contact Person: Gregory Shoop, City Planner  
GregShoop@lacity.org

### **Organization of Initial Study**

This Draft Initial Study is organized into six sections as follows:

Introduction: This section provides introductory information such as the Project title, the Project Applicant, and the Lead Agency for the Project.

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

Initial Study Checklist: This section contains the completed Initial Study Checklist.

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

Preparers of Initial Study and Persons Consulted: This section provides a list of City personnel, other governmental agencies, and consultant team members that participated in the preparation of the Initial Study.

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## II. PROJECT DESCRIPTION

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### ENVIRONMENTAL SETTING

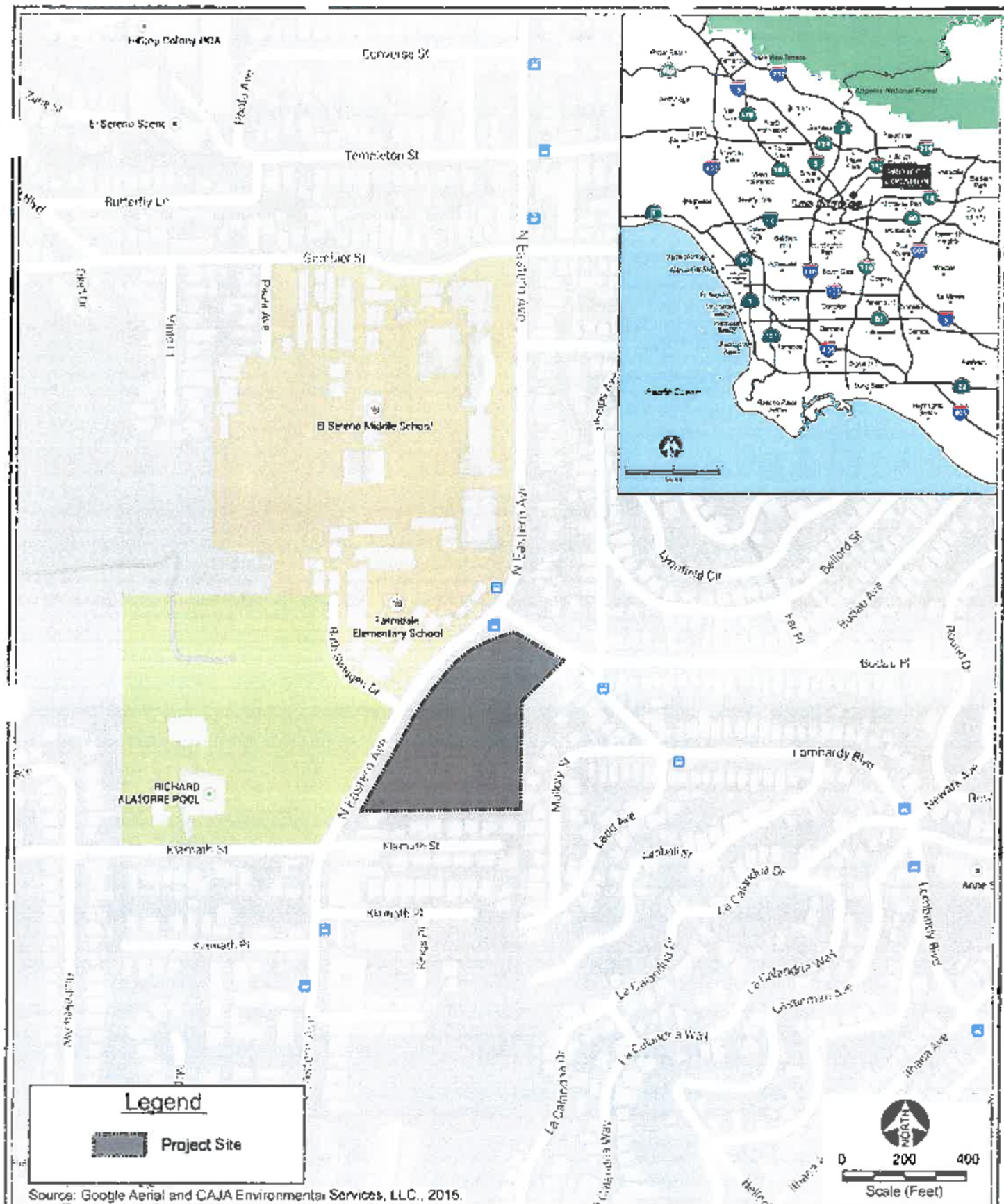
The Project site is located in the Northeast Los Angeles Community Plan Area of the City of Los Angeles (the "City") (refer to Figures II-1 and II-2). Views of the Project site are shown on Figure II-3. Specifically, the Project site includes three contiguous lots totaling approximately 218,270 square feet, located at the south corner of Eastern Avenue and Lombardy Boulevard. The Project site is bound by North Eastern Avenue on the west/northwest, Lombardy Boulevard on the north, and single-family residential land uses on the northeast, east, and south. The topography of the Project site is hilly, with elevations ranging from approximately 440 to approximately 530 feet above sea level (asl). The Project site is an infill site that is not currently developed with any structures. The Project site's assessor parcel numbers (APNs), zoning, land use designation, and parcel sizes are listed on Table II-1. As shown, the Project site is zoned [Q]R1-ID (Qualified Condition, One-Family Zone, Height District 1) and [Q]RD6-ID (Qualified Condition, Restricted Density Multiple Dwelling Zone, Height District 1). The land use designation for the Project site is Low Residential. The existing zoning and land use designation for the Project site are shown on Figures II-4 and II-5, respectively.

Existing land uses surrounding the Project site include single-family residential development to the north, east, and south; Farmdale Elementary School to the northwest; and El Sereno Recreation Center to the west. Views of the surrounding area are shown on Figure II-6. The existing zoning and land use designation of the area surrounding the Project site are shown on Figures II-4 and II-5, respectively.

### PROJECT CHARACTERISTICS

The Project includes development of the Project site with 42 single-family residential homes, one home per parcel (refer to Figures II-7 through II-25). Each house would have 3-4 bedrooms and a 2-car garage. The homes would range in size from approximately 1,729 square feet to 2,279 square feet. Of the 102 protected trees located on the Project site, 37 to 39 protected trees would be removed. Of the 72 non-protected trees located on the Project site, 13 would be retained in place, and 59 would be removed. All trees would be replaced in accordance with City tree replacement requirements. The Project would include a cistern system that would capture rainwater to use for landscape irrigation. Development of the Project would require the export of approximately 78,000 cubic yards of soil.

Figure II-1 Vicinity Map



Source: Google Aerial and CAJA Environmental Services, LLC., 2015.

Figure II-1  
Vicinity Map





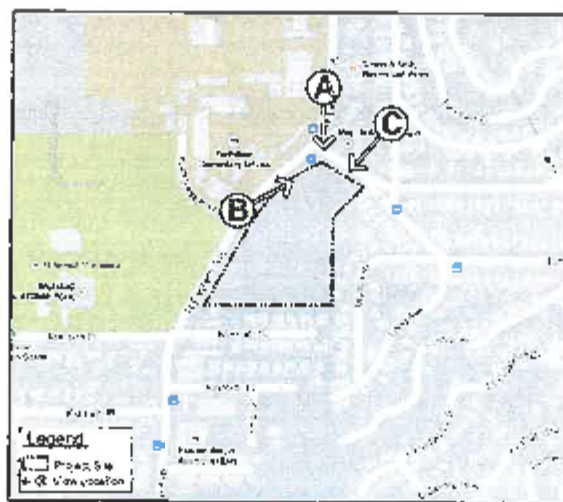
**Photo A:** View looking toward the south of the Project site.



**Photo B:** View looking toward the northeast of the Project site.



**Photo C:** View toward the southwest of the Project site.




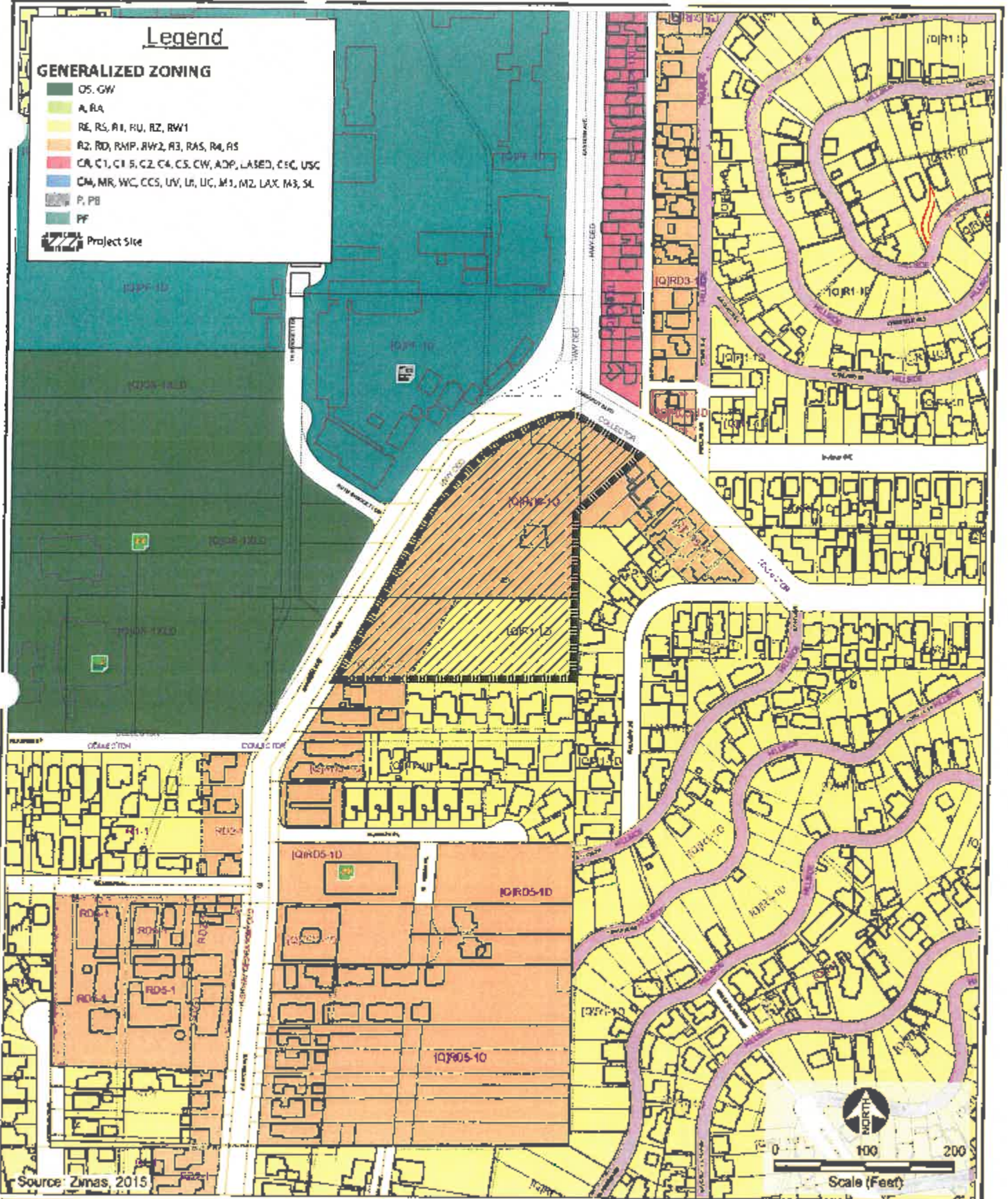
**View Location Map**



# Legend

## GENERALIZED ZONING

- OS, GW
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS, RA, RS
- CA, C1, C1 S, C2, C4, C5, CW, ADP, LABED, CEG, USC
- CM, MR, WC, CCS, UV, U1, U2, M1, M2, LAX, M3, S1
- P, PB
- PF
-  Project Site



### Legend

#### GENERAL PLAN LAND USE

##### LAND USE

##### RESIDENTIAL

Low / Low I Residential

Low Medium / Low Medium I Residential

##### COMMERCIAL

Neighborhood Office Commercial

##### OPEN SPACE / PUBLIC FACILITIES

Open Space

Public Facilities

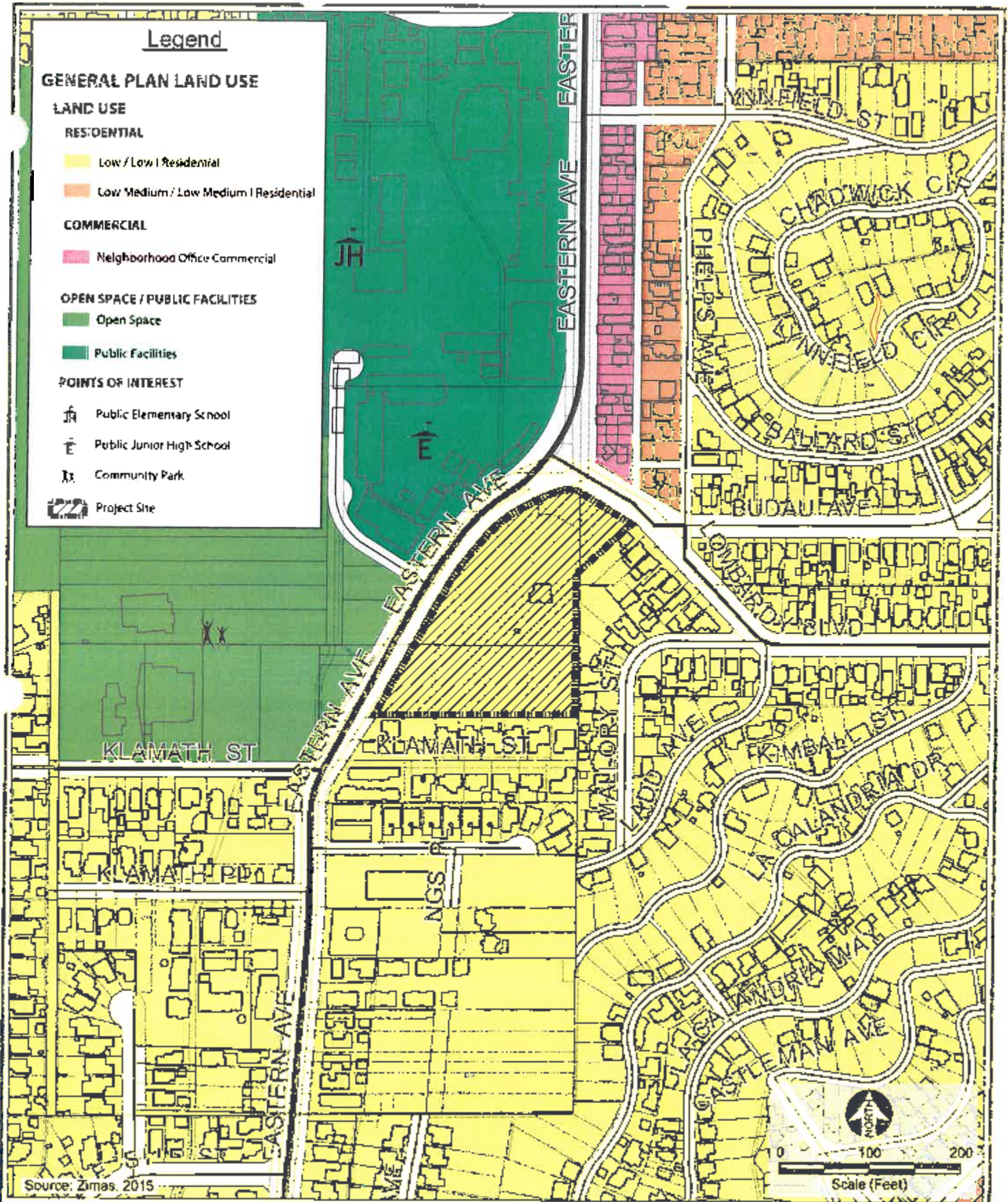
##### POINTS OF INTEREST

Public Elementary School

Public Junior High School

Community Park

Project Site



Source: Zimas, 2015



**Photo A:** View of the park located to the west of the Project site.



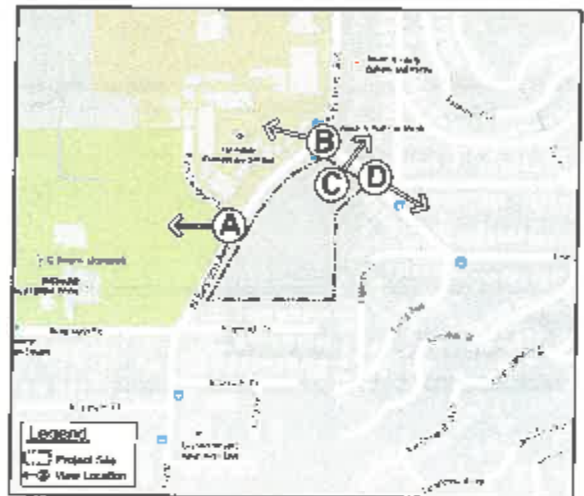
**Photo B:** View of the school located to the northwest of the Project site.



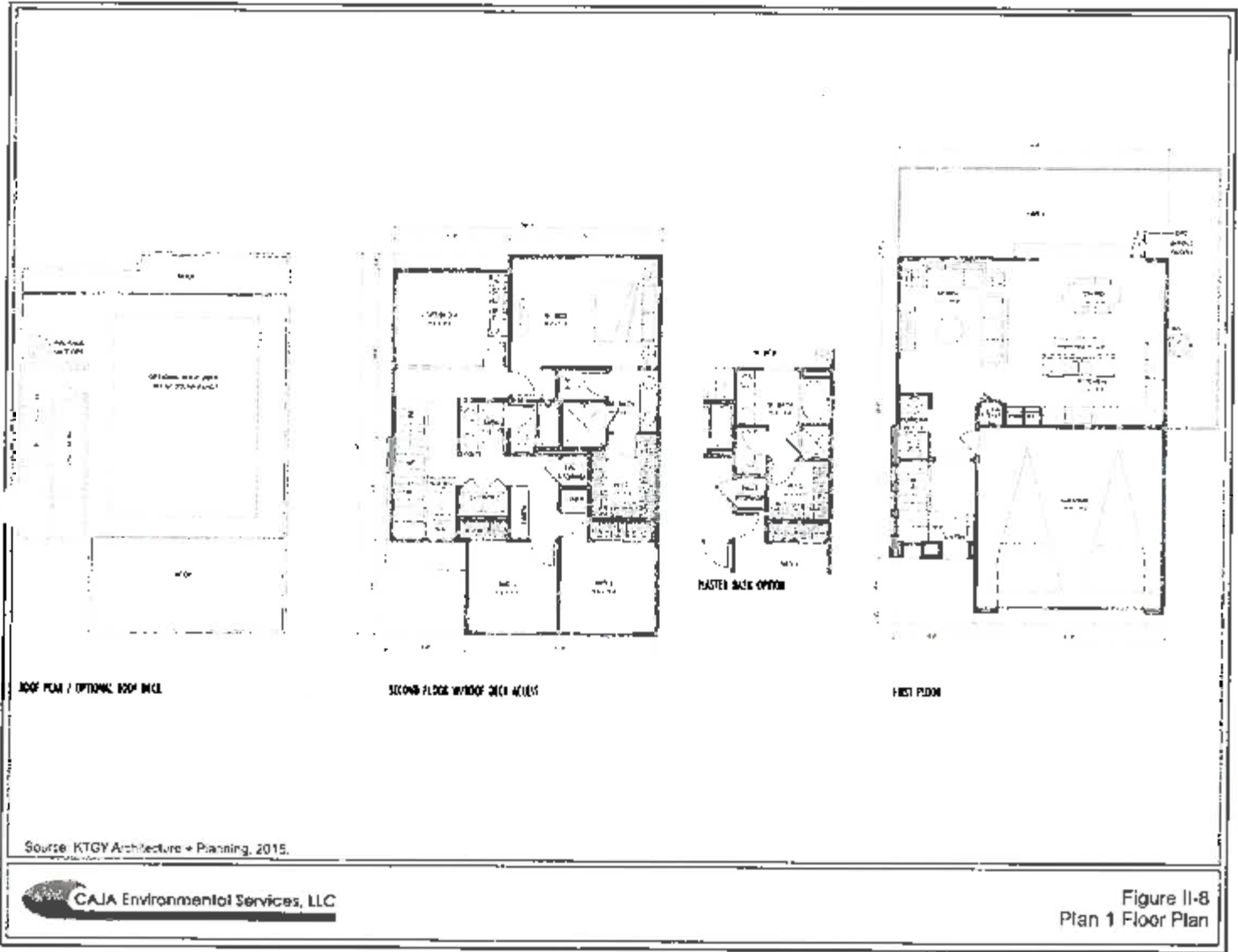
**Photo C:** View of the mix of land uses located to the north of the Project site.

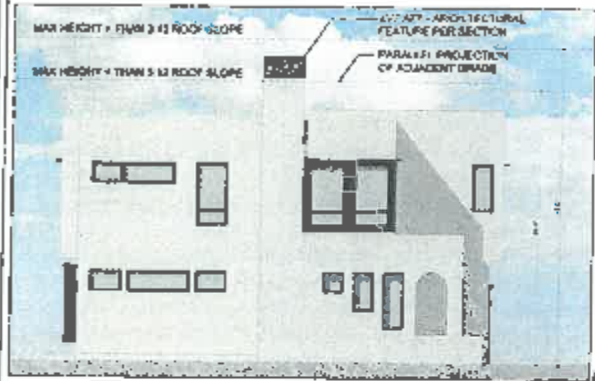


**Photo D:** View of the residential development located to the north and west of the Project site.

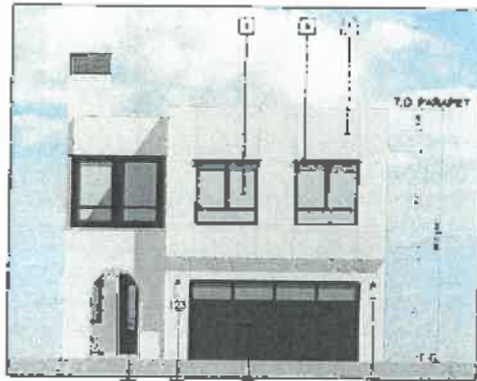


**View Location Map**

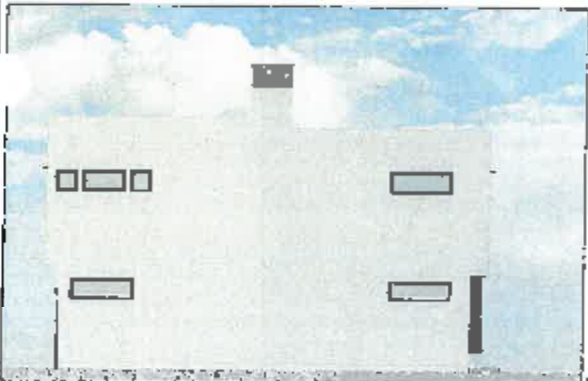




WEST ELEVATION



NORTH ELEVATION



EAST ELEVATION

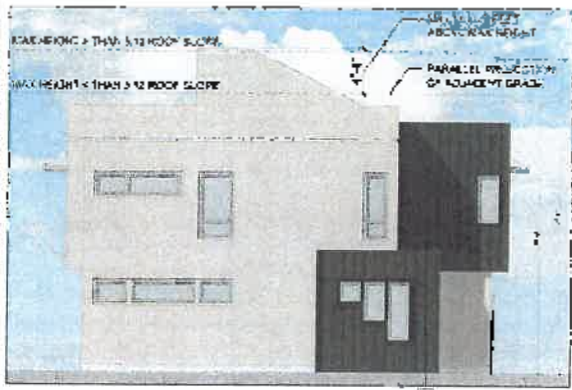


SOUTH ELEVATION

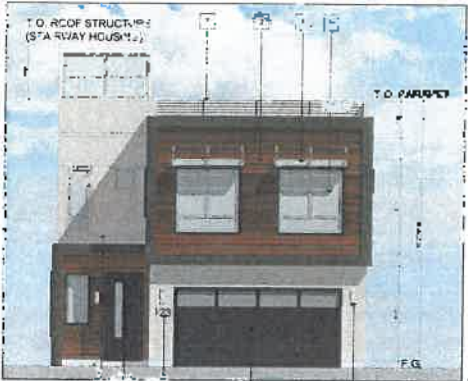
**MATERIALS**

1	CONCRETE	100%
2	BRICK	100%
3	GLASS	100%
4	WOOD	100%
5	ROOFING	100%
6	PAINT	100%
7	LANDSCAPE	100%
8	LANDSCAPE	100%
9	LANDSCAPE	100%
10	LANDSCAPE	100%
11	LANDSCAPE	100%
12	LANDSCAPE	100%
13	LANDSCAPE	100%
14	LANDSCAPE	100%
15	LANDSCAPE	100%
16	LANDSCAPE	100%
17	LANDSCAPE	100%
18	LANDSCAPE	100%
19	LANDSCAPE	100%
20	LANDSCAPE	100%

Source: KTG Architecture + Planning, 2015.



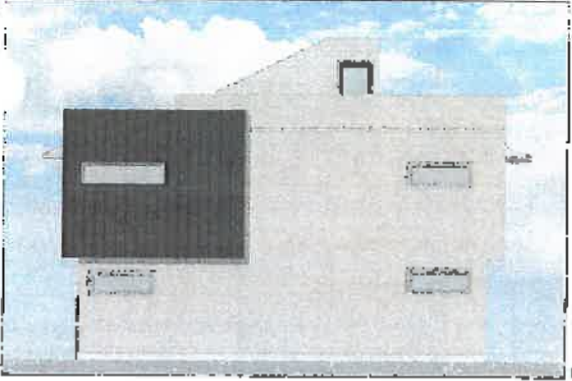
LEFT ELEVATION



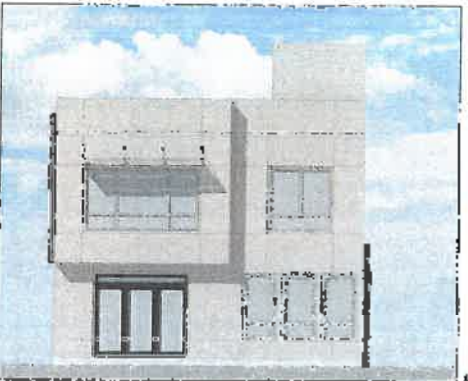
FRONT ELEVATION

MATERIAL LEGEND

1	WOOD GUTTER DRAIN
2	WOOD TRIM (PANEL LINING)
3	WOOD CLADDING
4	WOOD SHINGLES (SHINGLES)
5	WOOD
6	META. PANELS
7	META. CLADDING
8	BRICKWORK
9	META. SHINGLES (SHINGLES)
10	META. SHINGLES (SHINGLES)
11	WOOD TRIM (PANEL LINING)
12	WOOD TRIM (PANEL LINING)
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96	WOOD TRIM (PANEL LINING)
97	WOOD TRIM (PANEL LINING)
98	WOOD TRIM (PANEL LINING)
99	WOOD TRIM (PANEL LINING)
100	WOOD TRIM (PANEL LINING)



RIGHT ELEVATION



REAR ELEVATION

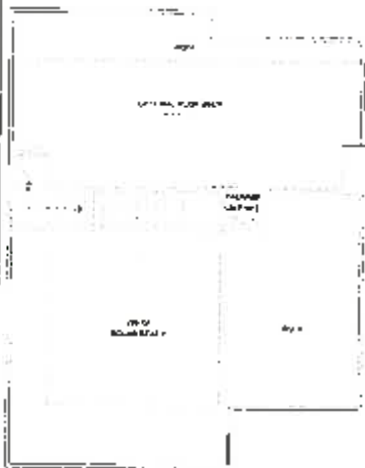
Source: KTG Architecture + Planning, 2015



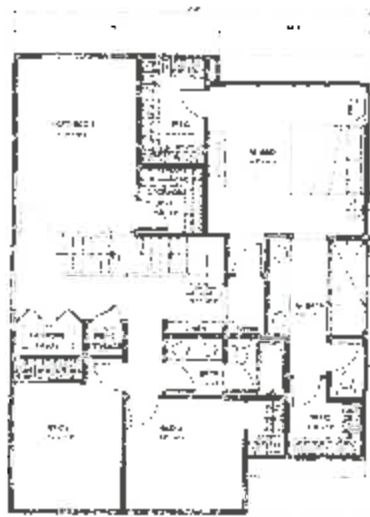
Source: KTGY Architecture + Planning, 2015.



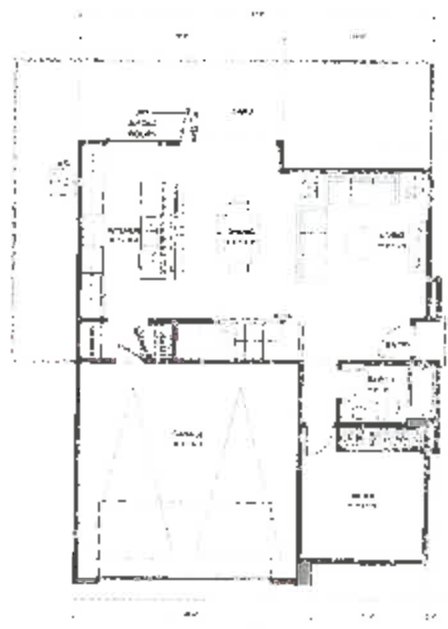
Figure II-11  
Typical Street Scene (Lot 23-25)



NOI PLAN / OPTIONAL NOI DECS



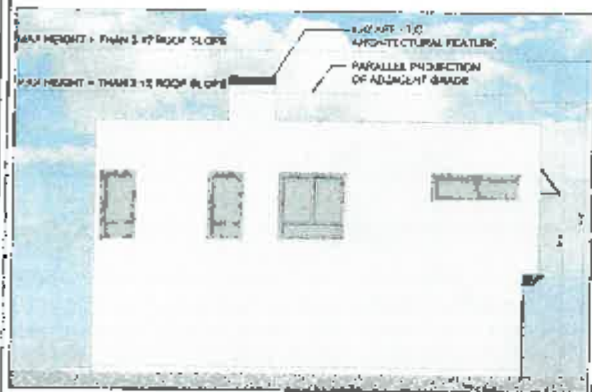
SECOND FLOOR W/LOUW BCEL AND IS



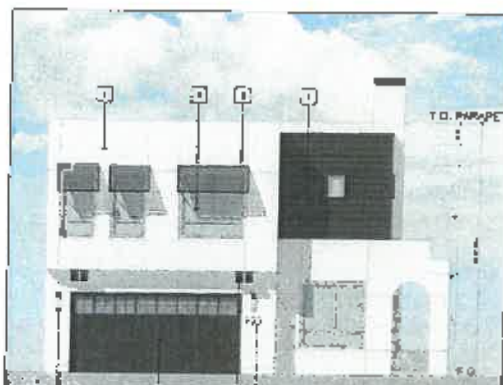
FIRST FLOOR

Source: KTOY Architecture + Planning 2015.





NORTH ELEVATION



FRONT ELEVATION

**MATERIAL LEGEND**

1	Concrete	3/4" x 3/4"
2	Stucco	1/2" x 1/2"
3	Brick	2" x 8"
4	Stone	4" x 8"
5	Wood	2" x 4"
6	Paint	1/2" x 1/2"
7	Roof	1/2" x 1/2"
8	Window	1/2" x 1/2"
9	Door	1/2" x 1/2"
10	Handicap	1/2" x 1/2"
11	Light	1/2" x 1/2"
12	Sign	1/2" x 1/2"
13	Planter	1/2" x 1/2"
14	Other	1/2" x 1/2"



SOUTH ELEVATION

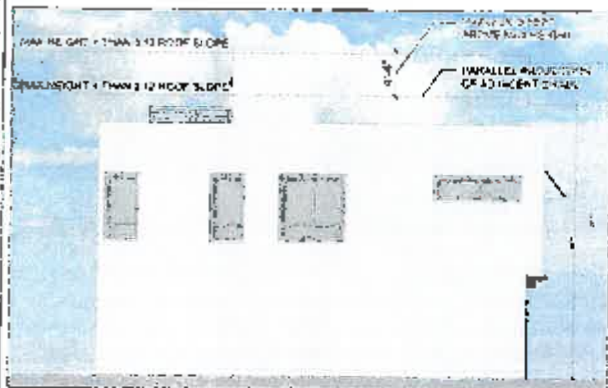


WEST ELEVATION

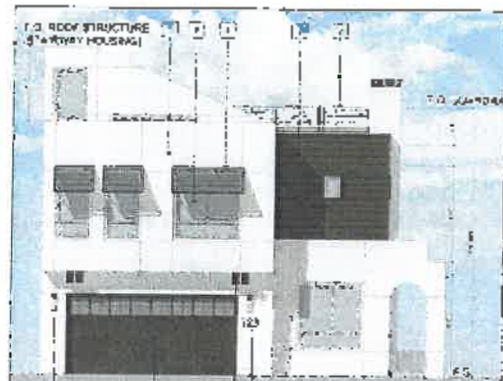
Source: KTG Architecture + Planning, 2015.



Figure II-13  
Plan 2 Elevation Alternative 1

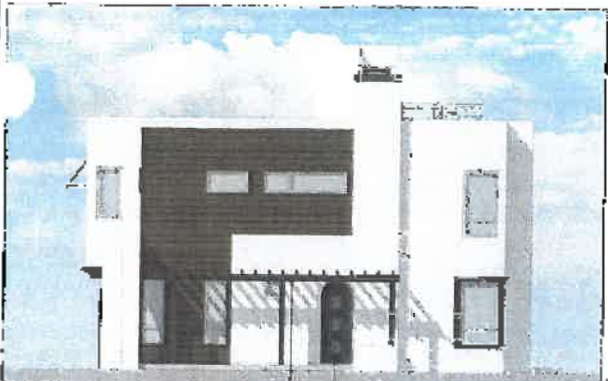


LEFT ELEVATION



RIGHT ELEVATION

MATERIAL LEGEND	
1	Concrete
2	Light Gray Brick
3	Dark Gray Brick
4	Dark Gray Brick
5	Dark Gray Brick
6	Dark Gray Brick
7	Dark Gray Brick
8	Dark Gray Brick
9	Dark Gray Brick
10	Dark Gray Brick
11	Dark Gray Brick
12	Dark Gray Brick
13	Dark Gray Brick
14	Dark Gray Brick
15	Dark Gray Brick
16	Dark Gray Brick
17	Dark Gray Brick
18	Dark Gray Brick
19	Dark Gray Brick
20	Dark Gray Brick



FRONT ELEVATION



REAR ELEVATION

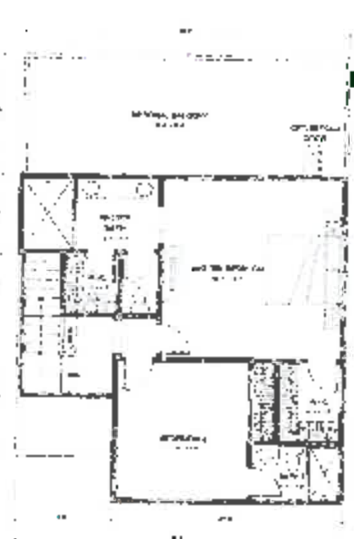
Source: KTG Architecture + Planning, 2015.



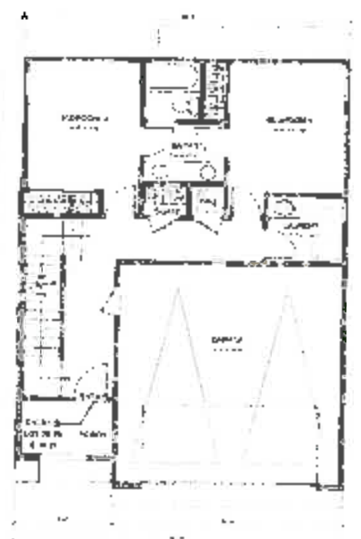
Source: KTG Architecture + Planning, 2015.



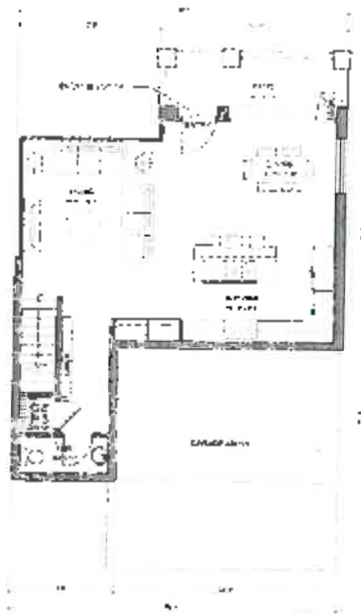
Figure II-15  
Typical Perspective (Lot 17-19)



SECOND FLOOR



FIRST FLOOR



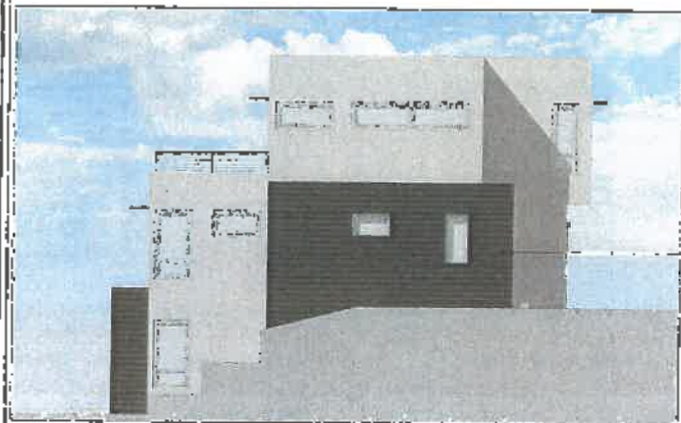
BASMENT

Source: RTGY Architecture + Planning, 2015

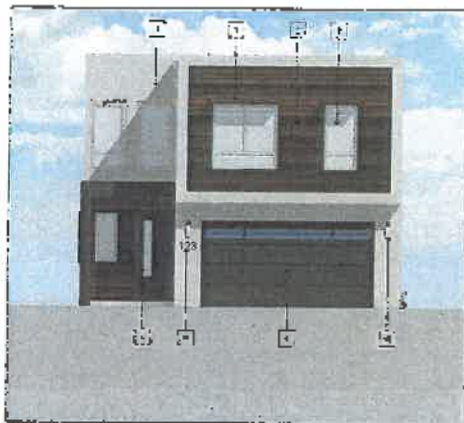


Figure II-16  
Plan 3 Floor Plan





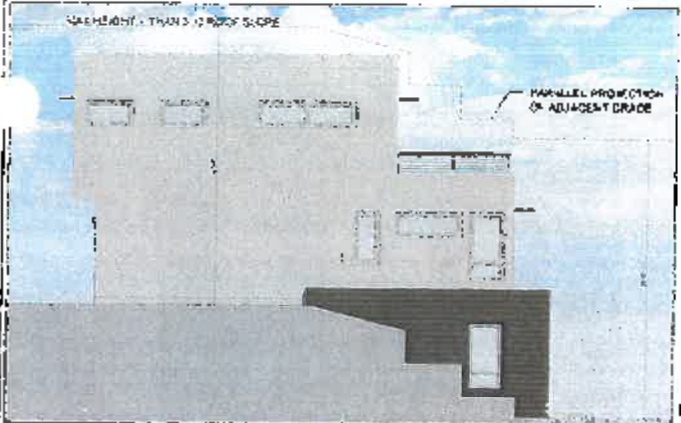
LEFT ELEVATION



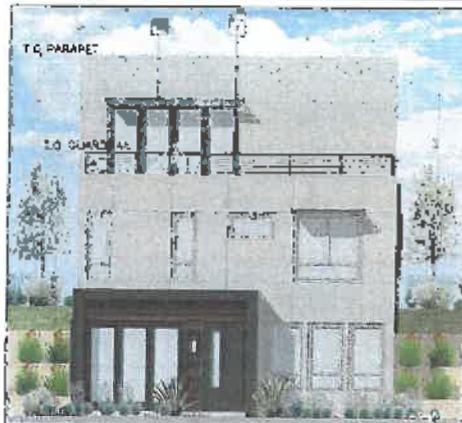
FRONT ELEVATION

**MATERIAL LEGEND**

1	Light Gray Concrete
2	Dark Brown Concrete
3	Dark Brown Wood
4	Light Gray Wood
5	Dark Brown Metal
6	Light Gray Metal
7	Dark Brown Glass
8	Light Gray Glass
9	Dark Brown Stone
10	Light Gray Stone



RIGHT ELEVATION



REAR ELEVATION

Source: KIGY Architects + Planning 2015.

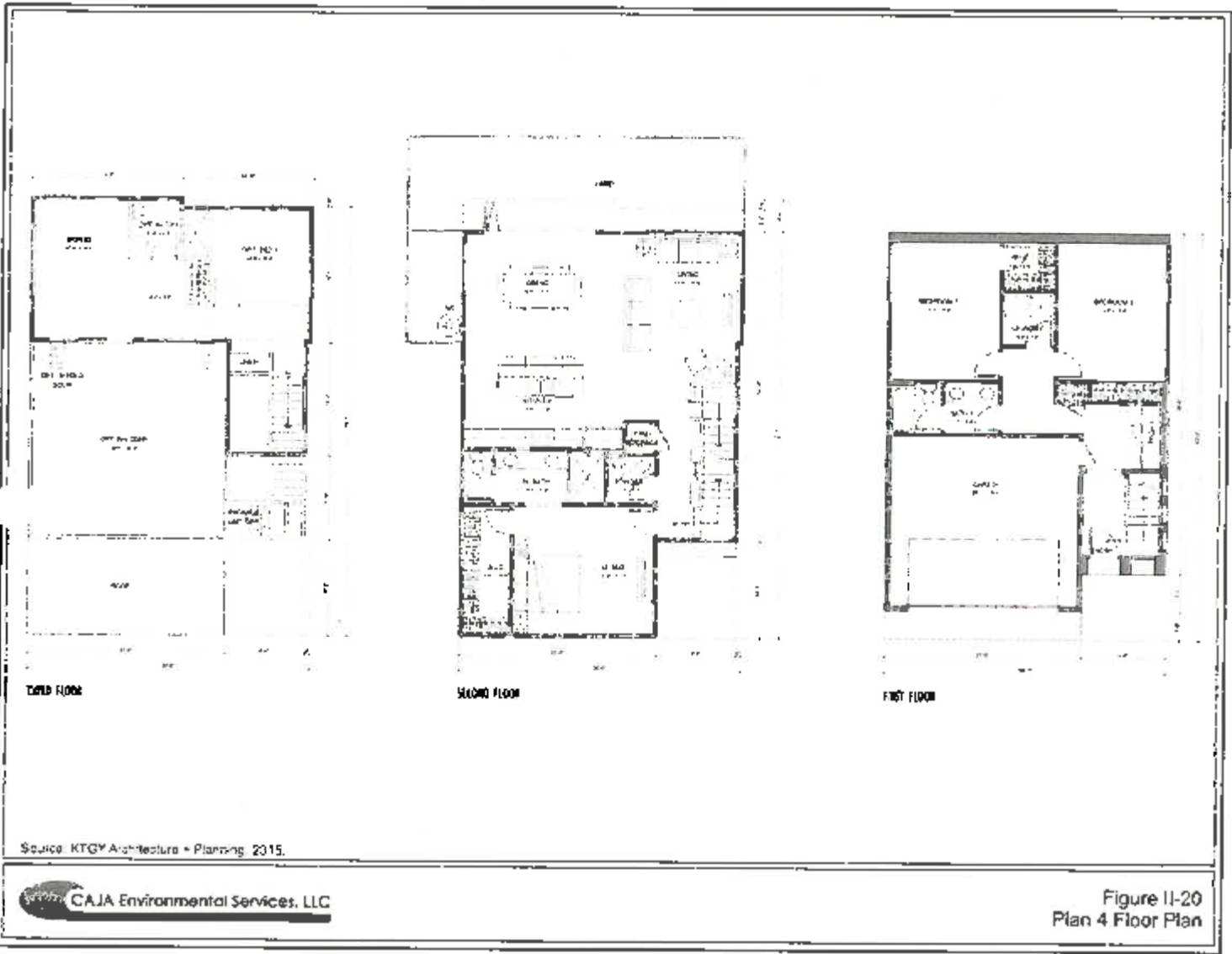


© 2015 FARR & PARTNERS, INC.

Source: KTOY Architecture + Planning, 2015.

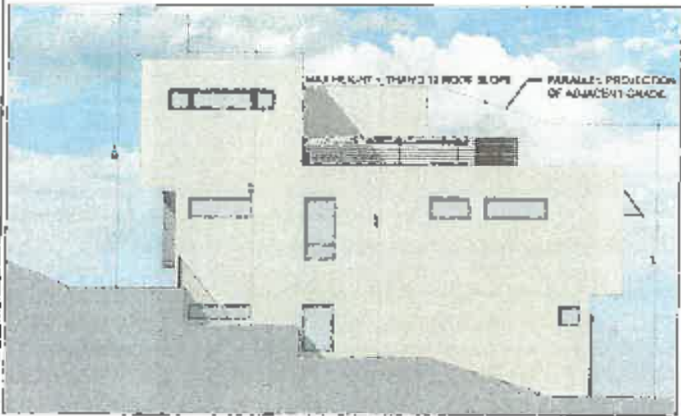


Figure II-19  
Typical Perspective (Lot 1-4)



Source: KTG Architecture + Planning, 2015.





LEFT ELEVATION



RIGHT ELEVATION



BACK ELEVATION

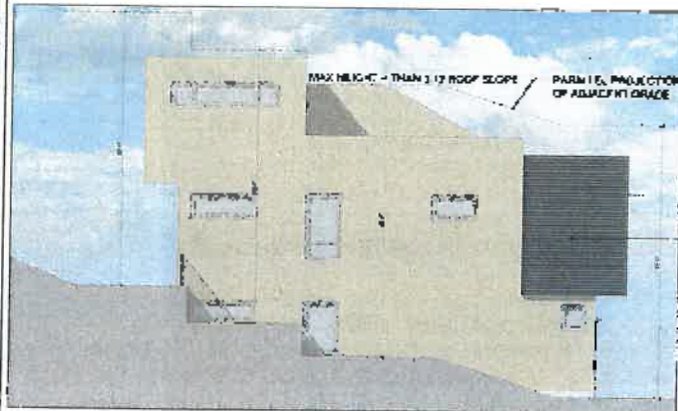


FRONT ELEVATION

**SYMBOL LEGEND**

[Symbol]	Window
[Symbol]	Door
[Symbol]	Roof
[Symbol]	Parapet
[Symbol]	Overhang
[Symbol]	Foundation
[Symbol]	Site
[Symbol]	Planting
[Symbol]	Lighting
[Symbol]	Signage
[Symbol]	Other

Source: KTOY Architecture + Planning, 2015.



LEFT ELEVATION



FRONT ELEVATION



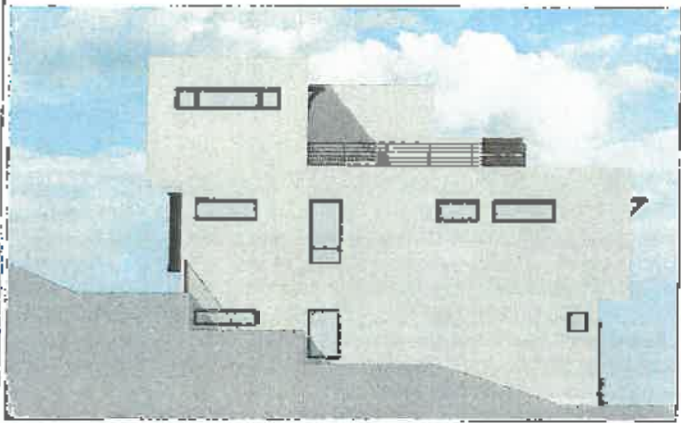
RIGHT ELEVATION



REAR ELEVATION

MATERIAL LEGEND	
1	BRICK (TOP SECTION)
2	SMOOTH CONCRETE (GROUND)
3	STUCCO
4	WOOD SLAT (HORIZONTAL)
5	WOOD SLAT (VERTICAL)
6	WOOD SLAT (DIAGONAL)
7	WOOD SLAT (RANDOM)
8	WOOD SLAT (HORIZONTAL - DARK)
9	WOOD SLAT (VERTICAL - DARK)
10	WOOD SLAT (DIAGONAL - DARK)
11	WOOD SLAT (RANDOM - DARK)
12	WOOD SLAT (HORIZONTAL - LIGHT)
13	WOOD SLAT (VERTICAL - LIGHT)
14	WOOD SLAT (DIAGONAL - LIGHT)
15	WOOD SLAT (RANDOM - LIGHT)
16	WOOD SLAT (HORIZONTAL - MEDIUM)
17	WOOD SLAT (VERTICAL - MEDIUM)
18	WOOD SLAT (DIAGONAL - MEDIUM)
19	WOOD SLAT (RANDOM - MEDIUM)
20	WOOD SLAT (HORIZONTAL - DARK BROWN)
21	WOOD SLAT (VERTICAL - DARK BROWN)
22	WOOD SLAT (DIAGONAL - DARK BROWN)
23	WOOD SLAT (RANDOM - DARK BROWN)
24	WOOD SLAT (HORIZONTAL - LIGHT BROWN)
25	WOOD SLAT (VERTICAL - LIGHT BROWN)
26	WOOD SLAT (DIAGONAL - LIGHT BROWN)
27	WOOD SLAT (RANDOM - LIGHT BROWN)
28	WOOD SLAT (HORIZONTAL - MEDIUM BROWN)
29	WOOD SLAT (VERTICAL - MEDIUM BROWN)
30	WOOD SLAT (DIAGONAL - MEDIUM BROWN)
31	WOOD SLAT (RANDOM - MEDIUM BROWN)
32	WOOD SLAT (HORIZONTAL - DARK GREY)
33	WOOD SLAT (VERTICAL - DARK GREY)
34	WOOD SLAT (DIAGONAL - DARK GREY)
35	WOOD SLAT (RANDOM - DARK GREY)
36	WOOD SLAT (HORIZONTAL - LIGHT GREY)
37	WOOD SLAT (VERTICAL - LIGHT GREY)
38	WOOD SLAT (DIAGONAL - LIGHT GREY)
39	WOOD SLAT (RANDOM - LIGHT GREY)
40	WOOD SLAT (HORIZONTAL - MEDIUM GREY)
41	WOOD SLAT (VERTICAL - MEDIUM GREY)
42	WOOD SLAT (DIAGONAL - MEDIUM GREY)
43	WOOD SLAT (RANDOM - MEDIUM GREY)
44	WOOD SLAT (HORIZONTAL - DARK BLUE)
45	WOOD SLAT (VERTICAL - DARK BLUE)
46	WOOD SLAT (DIAGONAL - DARK BLUE)
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51	WOOD SLAT (RANDOM - LIGHT BLUE)
52	WOOD SLAT (HORIZONTAL - MEDIUM BLUE)
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54	WOOD SLAT (DIAGONAL - MEDIUM BLUE)
55	WOOD SLAT (RANDOM - MEDIUM BLUE)
56	WOOD SLAT (HORIZONTAL - DARK GREEN)
57	WOOD SLAT (VERTICAL - DARK GREEN)
58	WOOD SLAT (DIAGONAL - DARK GREEN)
59	WOOD SLAT (RANDOM - DARK GREEN)
60	WOOD SLAT (HORIZONTAL - LIGHT GREEN)
61	WOOD SLAT (VERTICAL - LIGHT GREEN)
62	WOOD SLAT (DIAGONAL - LIGHT GREEN)
63	WOOD SLAT (RANDOM - LIGHT GREEN)
64	WOOD SLAT (HORIZONTAL - MEDIUM GREEN)
65	WOOD SLAT (VERTICAL - MEDIUM GREEN)
66	WOOD SLAT (DIAGONAL - MEDIUM GREEN)
67	WOOD SLAT (RANDOM - MEDIUM GREEN)
68	WOOD SLAT (HORIZONTAL - DARK RED)
69	WOOD SLAT (VERTICAL - DARK RED)
70	WOOD SLAT (DIAGONAL - DARK RED)
71	WOOD SLAT (RANDOM - DARK RED)
72	WOOD SLAT (HORIZONTAL - LIGHT RED)
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76	WOOD SLAT (HORIZONTAL - MEDIUM RED)
77	WOOD SLAT (VERTICAL - MEDIUM RED)
78	WOOD SLAT (DIAGONAL - MEDIUM RED)
79	WOOD SLAT (RANDOM - MEDIUM RED)
80	WOOD SLAT (HORIZONTAL - DARK PURPLE)
81	WOOD SLAT (VERTICAL - DARK PURPLE)
82	WOOD SLAT (DIAGONAL - DARK PURPLE)
83	WOOD SLAT (RANDOM - DARK PURPLE)
84	WOOD SLAT (HORIZONTAL - LIGHT PURPLE)
85	WOOD SLAT (VERTICAL - LIGHT PURPLE)
86	WOOD SLAT (DIAGONAL - LIGHT PURPLE)
87	WOOD SLAT (RANDOM - LIGHT PURPLE)
88	WOOD SLAT (HORIZONTAL - MEDIUM PURPLE)
89	WOOD SLAT (VERTICAL - MEDIUM PURPLE)
90	WOOD SLAT (DIAGONAL - MEDIUM PURPLE)
91	WOOD SLAT (RANDOM - MEDIUM PURPLE)
92	WOOD SLAT (HORIZONTAL - DARK PINK)
93	WOOD SLAT (VERTICAL - DARK PINK)
94	WOOD SLAT (DIAGONAL - DARK PINK)
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99	WOOD SLAT (RANDOM - LIGHT PINK)
100	WOOD SLAT (HORIZONTAL - MEDIUM PINK)
101	WOOD SLAT (VERTICAL - MEDIUM PINK)
102	WOOD SLAT (DIAGONAL - MEDIUM PINK)
103	WOOD SLAT (RANDOM - MEDIUM PINK)

Source: KTG Architecture + Planning, 2015.



LEFT ELEVATION



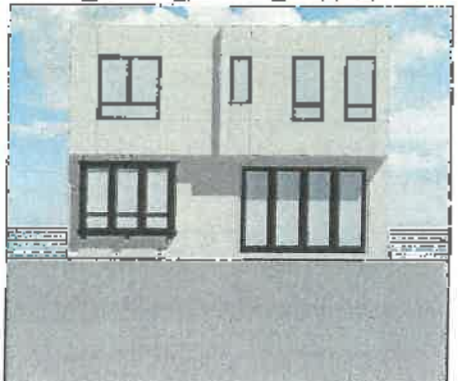
FRONT ELEVATION

**MATERIALS LEGEND**

1	Concrete
2	Stucco
3	Brick
4	Stone
5	Wood
6	Asphalt Shingles
7	Green Roof
8	Grass
9	Gravel
10	Asphalt
11	Concrete
12	Stucco
13	Brick
14	Stone
15	Wood
16	Asphalt Shingles
17	Green Roof
18	Grass
19	Gravel
20	Asphalt



RIGHT ELEVATION



REAR ELEVATION

Source: KTG Architecture + Planning, 2015.



Figure II-23  
Plan 4 Elevation Alternative 3



CORNER OF CONRARD BLVD. AND EASTERN AVE.

Source: KTG Architecture + Planning, 2015



Figure II-24  
Typical Perspective (Lot 38-42)



TOWN 12300 (04/14/15) 0410

Source: KTOY Architecture + Planning 2015.



Figure I-25  
Typical Perspective (Lot 39-42)

**Table II-1  
Project Site Information**

Addresses	APN	Zoning Information	General Plan Land Use Designation
2520, 2532 North Eastern Avenue	5216008016	[Q]R1-1D [Q]RD6-1D	Low Residential
2608 North Eastern Avenue	5216008034	Z1-2129 East Los Angeles State Enterprise Zone	
2668 North Eastern Avenue	5216009037	Z1-2399 Northeast Los Angeles Hillside	
2647, 2649, 2651 Lombardy Boulevard			

*Source: Zone Information & Map Access System (ZIMAS): <http://zimas.lacity.org>, February 20, 2015.*

## REQUESTED DISCRETIONARY ACTIONS

In order to implement the Project, the Project Applicant is requesting approval of the following discretionary actions from the City:

- **Vesting Tract Map (VTT) for Small Lot Purposes per LAMC Section 17.03** – Request is for the Advisory Agency to grant (1) a Vesting Tentative Tract Map to create 42 single-family lots in accordance with the Small Lot Subdivision Ordinance No. 176,354 in the Northeast Los Angeles Community Plan.
- **Tree Removal Permit** – Request is authorization from the Board of Public Works or the Advisory Agency to allow for the removal of up to 39 protected trees pursuant to LAMC Section 17.05R1(b).
- **Vesting Zone Change (ZC) per LAMC Section 12.32** – Request to permit a change of zone from [Q]R1-1D and [Q] RD6-1D to (T)(Q)RD5-1D.
- **Zoning Administrator's Determination (ZAD) per LAMC Section 12.24 X.26** – Request is to allow 54 walls varying in height from 3.5 feet to 6.0 feet in lieu of the maximum of 2 10-foot retaining walls otherwise required in LAMC Section 12.21 C.8(a).
- **Haul Route Approval** from the Board of Building and Safety Commission or Advisory Agency.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

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### 1. AESTHETICS

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

**Less Than Significant Impact.** Views from the Project site and immediate area primarily include those of the mix of urban land uses that define the area, including single- and multi-family residential development, a school, a park, commercial land uses, and roadway and utility infrastructure. Intermittent views of the San Gabriel Mountains are available to the north of the Project area, but these views are limited by existing terrain and development. Scenic vistas are available from public trails atop the hill toward the west of the Project site associated with the Ascot Hills Park, which has a peak elevation of approximately 770 feet above sea level. However, the Project site is lower in elevation than this location. The roof of the house developed at the highest elevation on the Project site would reach approximately 543 feet above sea level. As such, the Project would not occlude scenic views available from the park. Therefore, Project impacts related to scenic vistas would be less than significant.

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

**Less Than Significant With Mitigation Incorporated.** No scenic highways are located in proximity to the Project site. No rock outcroppings or historic buildings are located on the Project site. A Tree Preservation Report was prepared for the Project that identified 102 protected trees measuring 4-inch trunk diameter or larger and 72 non-protected measuring 8-inch trunk diameter or larger (refer to Appendix A).<sup>1</sup> Of the 102 protected trees, 63 to 65 would be retained in place, depending on health and construction impacts. Thirty-seven to 39 protected trees would be removed.<sup>2</sup> Of the 72 non-protected trees, 13 would be retained in place, and 59 would be removed. However, as required by the City of Los Angeles (the "City") and as outlined in Mitigation Measures 1-1 and 1-2, the removed non-protected trees would be replaced on the Project site at a 1:1 ratio, and the removed protected trees would be replaced on the Project site at a 4:1 ratio, respectively. This 4:1 replacement mitigation requirement is double the minimum 2:1 replacement requirement set forth in the City's Protected Tree Ordinance (LAMC Section 17.05R[4][a]). Pursuant to the City's Protected Tree Ordinance the trees planted to replace the removed

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<sup>1</sup> *Tree Preservation Report, Arborgate Consulting, Inc., January 3, 2017. Refer to Appendix A.*

<sup>2</sup> *According to the Tree Survey, 37 protected trees must be removed. However, two additional protected trees (for a total of 39 protected trees) may also need to be removed due to their poor health prior to construction. Although all efforts to save these two trees will be made by the Applicant prior to construction, because the survival of these two trees cannot be assured at this time, the IS/MND conservatively assumes the removal of a maximum of 39 protected trees.*

protected trees on a 4:1 ratio shall be (1) a protected variety, and (2) at least 15 gallons in size or larger measuring one inch or more in diameter at a point one foot above the base, and not less than seven feet in height. Additionally, prior to preparation of the Tree Survey, 8 qualifying protected trees were removed by a prior owner without the benefit of a tree removal permit. The replacement requirements for the 8 qualifying trees and the 37 to 39 protected trees that would be removed as part of the Project would be one *Juglans californica* and three *Quercus* for each of the removed protected trees. Therefore, with implementation of these mitigation measures, the Project would not result in any significant impacts related to trees.

**c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?**

**Less than Significant Impact.** The Project site area is characterized by a mix of urban/sub-urban land uses, including single-family residential to the northeast, east, and south; a park to the west; a school to the northwest; and commercial to the north along Eastern Avenue. The Project includes development of 42 single-family homes, similar to those adjacent to the Project site and within the area. The size, height, and massing of the homes would comply with all Los Angeles Municipal Code (the "LAMC") requirements. Also, the design of the proposed homes would be required to comply with the City's design requirements (i.e., height, building materials, landscaping, etc.). The homes would be developed to accommodate the topography of the Project site, stepping up or down the hillside where necessary to minimize the amount of grading needed at the site and the change to the existing topography of the site, and to maximize the preservation of existing protected tree species. The visual character of the Project would conform to the visual character of the surrounding area. Therefore, no Project impacts related to visual character would occur.

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

**Less Than Significant Impact.** The Project site is located in the Northeast Los Angeles Community Plan area of the City that is developed with urban land uses, including single- and multi-family residential development, a school, a park, commercial land uses, and roadway and utility infrastructure, all of which produce light and glare (e.g., indoor/outdoor lighting, windows, light-colored surfaces, etc.) typical of such urban uses in the City. The Project site is an infill site that is currently not developed with any structures and does not include any sources of light or glare.

The Project would include interior and exterior lighting that complies with the LAMC to minimize the effect of the new sources of lighting that would be introduced. The Project would not include sources of nighttime illumination that would adversely affect nighttime views in the area, and no spill-over lighting would occur. Specifically, LAMC Section 91.6205 requires that new lighting sources not exceed 1 foot-candle of new light spillover at residential property lines. Also, the Project would be required to use non-reflective glass, pursuant to LAMC Section 93.0117. For these reasons, the Project would not create a

new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, Project impacts related to light and glare would be less than significant.

### **Mitigation Measures (Aesthetics)**

#### ***I-1: Non-Protected Trees***

- Prior to issuance of any permit related to development of the Project, a plot plan shall be prepared for the Project, indicating the location, size, type, and general condition of all existing trees on the Project site and within the adjacent public right(s)-of-way.
- All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the Project site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net new trees located within the parkway of the adjacent public-right(s)-of-way may be counted toward replacement tree requirements.
- Removal or planting of any tree in the public right-of-way shall require approval of the Board of Public Works. All trees in the public right-of-way shall be provided in the current standards of the Urban Forestry Division of the Department of Public Works, Bureau of Street Services.

#### ***I-2 Protected Trees***

- All protected tree removals shall require approval from the Board of Public Works.
- A Tree Report shall be submitted to the Urban Forestry Division of the Bureau of Street Services, Department of Public Works, for review and approval prior to implementation of the Report's recommended measures.
- According to the City's Protected Tree Ordinance, a minimum of four protected trees (a minimum of 15 gallon in size) shall be planted for each protected tree that is removed. The size of each replacement tree shall measure at least one inch or more in diameter at a point one foot above the base, and not less than seven feet in height, measured from the base.
- In consultation with the Division of Urban Forestry, twenty-five percent of the protected trees removed shall be replaced with 15-gallon *Juglans californica*.
- The location of the trees planted for the purposes of replacing a removed protected tree shall be clearly indicated on the required landscape plan, which shall also

indicate the replacement tree species and further contain the phrase "Replacement Tree" in its description.

**1-3      *Previously Removed Trees***

- The 8 qualifying previously removed protected trees shall be replaced at a ratio of one *Juglans californica* and three *Quercus* for each of the 8 trees, at a minimum of 15 gallon in size. The specific size and species of the trees to be planted as replacement for the protected trees being removed shall be determined by the Urban Forestry Division.

**1-4      *All Trees***

- **Protection Barrier:** A protection barrier shall be installed around the construction area as shown on the map included in the Tree Preservation Report (refer to Appendix A). The barrier shall be 6-foot-high chain-link fencing. Twelve-inch-high silt fence shall be attached to the base of the fence with the bottom edge buried 1-2 inches. The barrier may be placed on the line shown on the map or closer to construction, but not further. The fencing shall be maintained in good repair throughout the duration of the Project, and shall not be removed, relocated, or encroached upon without permission of the arborist involved.
- **Storage of Materials:** There shall be NO storage of materials or supplies of any kind inside the area of the protection fencing. Concrete and cement materials, block, sand and soil shall not be placed within the drip-line of any tree to remain.
- **Fuel Storage:** Fuel storage shall NOT be permitted within 150 feet of any tree to be preserved. Refueling, servicing and maintenance of equipment and machinery shall NOT be permitted within 150 feet of protected trees.
- **Debris and Waste Materials:** Debris and waste from construction or other activities shall NOT be permitted outside the construction area. Wash down of concrete or cement handling equipment, in particular, shall NOT be permitted within 150 feet of protected trees.
- **Planting near Trees Designated for Protection:** Any digging within designated protection zones shall be done using supersonic air directly as the digging medium, by means of a nozzle, whose nominal rated input pressure (available from manufacturer's literature) must not exceed 130 psig (pounds per square inch at gage) unless otherwise approved. Nozzles designed for input above 130 psig can damage fine roots. Air compressors rated between 100 to 125 psig recommended.

- **Grade Changes:** Any grade changes within the protection radius listed should be approved by a Registered Consulting Arborist before construction begins, and precautions taken to mitigate potential injuries. Grade changes can be particularly damaging to trees. Even as little as two inches of fill can cause the death of a tree. Lowering the grade can destroy major portions of a root system.
- **Damages:** Any tree damages or injuries should be reported to the project arborist as soon as possible. Severed roots shall be cut cleanly to healthy tissue, using proper pruning tools. Broken branches or limbs shall be pruned according to International Society of Arboriculture Pruning Guidelines and ANSI A-300 Pruning Standards.
- **Preventive Measures:** Pruning of the tree canopies and branches should be done at the direction of the project arborist to remove any dead or broken branches, and to provide any necessary clearances for the construction work or equipment.

### **Cumulative Impacts**

None of the related projects listed on Table IV-38 and shown on Figure IV-12 included later in this section are located within visual proximity of the Project. As such, the combination of the Project with the related projects would not result in any cumulative aesthetic impacts. The closest related project is located approximately one mile north of the Project site at 5479 East Huntington Drive. All new development in the City is required to comply with LAMC requirements referenced previously related to light and glare. Therefore, cumulative impacts related to aesthetics would be less than significant.

## **2. AGRICULTURE AND FORESTRY RESOURCES**

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

**No Impact.** The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project site is not included in the Important Farmland category.<sup>5</sup> Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. No impacts would occur.

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<sup>5</sup> State of California Department of Conservation, Division of Land Resource Protection, *Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland, 1998.*

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

**No Impact.** The Project site is not zoned for agricultural use, and the site is not under Williamson Act Contract.<sup>5</sup> Thus, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract. Therefore, no impacts related to this issue would occur.

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

**No Impact.** The Project site is not zoned as forest land or timberland. Therefore, no impacts related to this issue would occur.

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

**No Impact.** The Project site does not contain any forest land. Therefore, no impacts related to this issue would occur.

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

**No Impact.** The Project site and surrounding area are developed with single- and multi-family residential land uses. No agricultural uses are located on the Project site or within the area. Therefore, no impacts related to this issue would occur.

#### **Cumulative Impacts**

Neither the Project site nor any of the related projects' sites are used or designated as agricultural land or forest land. Therefore, no cumulative impacts related to agricultural resources would occur.

### **3. AIR QUALITY**

The information below is based on the Air Quality modeling results prepared by DKA Planning (refer to Appendix B).

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<sup>5</sup> *Ibid.*

## Pollutants and Effects

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards for outdoor concentrations. The federal and state standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include carbon monoxide (CO), ozone (O<sub>3</sub>), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), particulate matter 2.5 microns or less in diameter (PM<sub>2.5</sub>), particulate matter ten microns or less in diameter (PM<sub>10</sub>), and lead (Pb). These pollutants are discussed below.

- Carbon Monoxide (CO) is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. It is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, automobile exhaust accounts for the majority of emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient concentrations generally follow the spatial and temporal distributions of vehicular traffic. Concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February.<sup>5</sup> The highest concentrations occur during the colder months of the year when inversion conditions are more frequent. CO is a health concern because it competes with oxygen, often replacing it in the blood and reducing the blood's ability to transport oxygen to vital organs. Excess CO exposure can lead to dizziness, fatigue, and impair central nervous system functions.
- Ozone (O<sub>3</sub>) is a colorless gas that is formed in the atmosphere when reactive organic gases (ROG) and nitrogen oxides (NO<sub>x</sub>) react in the presence of ultraviolet sunlight. O<sub>3</sub> is not a primary pollutant; rather, it is a secondary pollutant formed by complex interactions of two pollutants directly emitted into the atmosphere. The primary sources of ROG and NO<sub>x</sub>, the components of O<sub>3</sub>, are automobile exhaust and industrial sources. Meteorology and terrain play major roles in O<sub>3</sub> formation. Ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The greatest source of smog-producing gases is the automobile. Short-term exposure (lasting for a few hours) to O<sub>3</sub> at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.

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<sup>5</sup> *Inversion is an atmospheric condition in which a layer of warm air traps cooler air near the surface of the earth, preventing the normal rising of surface air.*

- Nitrogen Dioxide (NO<sub>2</sub>) like O<sub>3</sub>, is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO<sub>2</sub> are collectively referred to as NO<sub>x</sub> and are major contributors to O<sub>3</sub> formation. NO<sub>2</sub> also contributes to the formation of PM<sub>10</sub>. High concentrations of NO<sub>2</sub> can cause breathing difficulties and result in a brownish-red cast to the atmosphere with reduced visibility. There is some indication of a relationship between NO<sub>2</sub> and chronic pulmonary fibrosis. Some increase of bronchitis in children (2-3 years old) has been observed at concentrations below 0.3 ppm.
- Sulfur Dioxide (SO<sub>2</sub>) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Main sources of SO<sub>2</sub> are coal and oil used in power plants and industries. Generally, the highest levels of SO<sub>2</sub> are found near large industrial complexes. In recent years, SO<sub>2</sub> concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO<sub>2</sub> and limits on the sulfur content of fuels. SO<sub>2</sub> is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO<sub>2</sub> can also yellow plant leaves and erode iron and steel.
- Particulate Matter (PM) consists of small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals and can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Fine particulate matter, or PM<sub>2.5</sub>, is roughly 1/28 the diameter of a human hair and results from fuel combustion (e.g. motor vehicles, power generation, industrial facilities), residential fireplaces, and wood stoves. In addition, PM<sub>2.5</sub> can be formed in the atmosphere from gases such as SO<sub>2</sub>, NO<sub>x</sub>, and VOC. Inhalable particulate matter, or PM<sub>10</sub>, is about 1/7 the thickness of a human hair. Major sources of PM<sub>10</sub> include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

PM<sub>2.5</sub> and PM<sub>10</sub> pose a greater health risk than larger-size particles. When inhaled, they can penetrate the human respiratory system's natural defenses and damage the respiratory tract. PM<sub>2.5</sub> and PM<sub>10</sub> can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates can cause lung damage directly. These substances can be absorbed into the blood stream and cause damage elsewhere in the body. These substances can transport absorbed gases, such as chlorides or ammonium, into the lungs and cause injury. Whereas PM<sub>10</sub> tends to collect in the upper portion of the respiratory system, PM<sub>2.5</sub> is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

- Lead (Pb) in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturers of batteries, paint, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the



phase-out of leaded gasoline reduced the overall inventory of airborne lead by nearly 95 percent. With the phase-out of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities have become lead-emission sources of greater concern.

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth.

- Toxic Air Contaminants (TAC) are airborne pollutants that may increase a person's risk of developing cancer or other serious health effects. TACs include over 700 chemical compounds that are identified by State and federal agencies based on a review of available scientific evidence. In California, TACs are identified through a two-step process established in 1983 that includes risk identification and risk management.

## Regulatory Setting

### *Federal*

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

As required by the CAA, NAAQS have been established for seven major air pollutants: CO, NO<sub>2</sub>, O<sub>3</sub>, PM<sub>2.5</sub>, PM<sub>10</sub>, SO<sub>2</sub>, and Pb. The CAA requires the USEPA to designate areas as attainment, non-attainment, or maintenance for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are summarized on Table IV-1. The USEPA has classified the South Coast Air Basin as non-attainment for O<sub>3</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub> and maintenance for CO and NO<sub>2</sub>.

### *State*

In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for administering the CCAA and

establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS, which are generally more stringent than the federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

CARB has broad authority to regulate mobile air pollution sources, such as motor vehicles. It is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The state standards are summarized on Table IV-1.

The CCAA requires CARB to designate areas within California as either attainment or non-attainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as non-attainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as non-attainment. Under the CCAA, the Los Angeles County portion of the South Coast Air Basin is designated as a non-attainment area for O<sub>3</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub>.<sup>6</sup>

### *Local*

#### *South Coast Air Quality Management District*

The 1977 Lewis Air Quality Management Act merged four air pollution control district to create the SCAQMD to coordinate air quality planning efforts throughout Southern California. It is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards. Programs include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. The SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

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<sup>6</sup> CARB, *Area Designation Maps*, available at <http://www.arb.ca.gov/destg/adm/adm.htm>, accessed August 17, 2013.

**Table IV-1  
State and National Ambient Air Quality Standards and  
Attainment Status for the South Coast Air Basin**

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O <sub>3</sub> )	1-hour	0.09 ppm (180 µg/m <sup>3</sup> )	Non-attainment	--	--
	8-hour	0.070 ppm (137 µg/m <sup>3</sup> )	N/A <sup>1</sup>	0.075 ppm (147 µg/m <sup>3</sup> )	Non-attainment
Respirable Particulate Matter (PM <sub>10</sub> )	24-hour	50 µg/m <sup>3</sup>	Non-attainment	150 µg/m <sup>3</sup>	Non-attainment
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>	Non-attainment	--	--
Fine Particulate Matter (PM <sub>2.5</sub> )	24-hour	--	--	35 µg/m <sup>3</sup>	Non-attainment
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	Non-attainment	15 µg/m <sup>3</sup>	Non-attainment
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 mg/m <sup>3</sup> )	Attainment	9 ppm (10 mg/m <sup>3</sup> )	Maintenance
	1-hour	20 ppm (23 mg/m <sup>3</sup> )	Attainment	35 ppm (40 mg/m <sup>3</sup> )	Maintenance
Nitrogen Dioxide (NO <sub>2</sub> )	Annual Arithmetic Mean	0.030 ppm (57 µg/m <sup>3</sup> )	Non-attainment	53 ppb (100 µg/m <sup>3</sup> )	Maintenance
	1-hour	0.18 ppm (338 µg/m <sup>3</sup> )	Non-attainment	100 ppb (188 µg/m <sup>3</sup> )	Maintenance
Sulfur Dioxide (SO <sub>2</sub> )	24-hour	0.04 ppm (105 µg/m <sup>3</sup> )	Attainment	--	Attainment
	1-hour	0.25 ppm (655 µg/m <sup>3</sup> )	Attainment	75 ppb (196 µg/m <sup>3</sup> )	Attainment
Lead (Pb)	30-day average	1.5 µg/m <sup>3</sup>	Non-attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m <sup>3</sup>	Attainment

<sup>1</sup>N/A = CARB has not determined 8-hour O<sub>3</sub> attainment status  
Source: CARB, Ambient Air Quality Standards, and attainment status, accessed October 20, 2014, ([www.arb.ca.gov/design/adm/adm.htm](http://www.arb.ca.gov/design/adm/adm.htm)).

The SCAQMD monitors air quality over its jurisdiction of 10,743 square miles, including the South Coast Air Basin, which covers an area of 6,745 square miles and is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto mountains to the north and east; and the San Diego County line to the south. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAQMD also regulates the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin.

All areas designated as non-attainment under the CCAA are required to prepare plans showing how they will meet the air quality standards. The SCAQMD prepares the Air Quality Management Plan (AQMP) to address CAA and CCAA requirements by identifying policies and control measures. The Southern California Association of Governments (SCAG) assists by preparing the transportation portion of the AQMP. On December 7, 2012, the SCAQMD adopted its 2012 AQMP, which is now the legally enforceable plan for meeting the 24-hour  $PM_{2.5}$  strategy standard by 2014.

In addition to criteria pollutants, the SCAQMD also regulates air toxics. A cornerstone of its work was the development of the Multiple Air Toxics Exposure Study (MATES-III). The monitoring program measured more than 30 air pollutants, including both gases and particulates, and estimated the risk of cancer from breathing toxic air pollution throughout the region. MATES-III found that the cancer risk in the region from carcinogenic air pollutants ranges from about 870 in a million to 1,400 in a million, with an average regional risk of about 1,200 in a million. An addendum to the plan was completed in March 2004 that included an update on the implementation of the mobile and stationary source strategies.

In its role as the local air quality regulatory agency, the SCAQMD also provides guidance on how environmental analyses should be prepared. This includes recommended thresholds of significance for evaluating air quality impacts.

#### *City of Los Angeles*

The Project is located in the Northeast Los Angeles Community Plan Area. Air quality policies are governed by the City's General Plan, which includes an Air Quality Element. Adopted on November 24, 1992, the Element includes six key goals that relate directly or indirectly to air quality:

1. Good air quality in an environment of continued population growth and healthy economic structure.
2. Less reliance on single-occupant vehicles with fewer commute and non-work trips.
3. Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand management techniques.
4. Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.
5. Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting.
6. Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

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

**Less Than Significant Impact.** In the case of projects proposed within the City or elsewhere in the South Coast Air Basin (the "Basin"), the applicable plan is the 2012 Air Quality Management Plan (AQMP), which is prepared by the South Coast Air Management District (SCAQMD). The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and cooperates actively with all state and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures through educational programs or fines, when necessary.

The regional ozone attainment plan centers on accommodating population growth forecasts by SCAG. Specifically, SCAG's growth forecasts from the 2016 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) are largely built off local growth forecasts from local governments like the City of Los Angeles. The RTP/SCS accommodates up to 4,609,400 persons; 1,690,300 households; and 2,169,100 jobs in the City by 2040.

The Project site is currently [Q]R1-ID and [Q]RD6-ID. The Northeast Los Angeles Community Plan land use designation for the site is Low Residential. The type of land use proposed as part of the Project (single-family residential) are allowed under the existing zoning and land use designation for the Project site. As discussed in more detail in response to Checklist Question 13a, as shown on Table IV-26, the Project would represent a negligible percent of the estimated population and housing growth in the City. The Project's residents and housing units would be within the forecasted population and housing SCAG and City estimates. Additionally, the Project would help achieve a portion of the household growth forecast for the City by adding housing to meet the need for housing identified in the City's Regional Housing Needs Assessment (the "RHNA"), while also being consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of vehicle miles traveled (VMT) as called for in SCAG's 2008 Regional Comprehensive Plan and 2012-2035 RTP and SCAQMD's AQMP. The Project would not substantially induce housing growth beyond forecasted levels. Instead, the Project would accommodate a portion of forecasted housing demand currently forecasted for the City, including low-income housing. Thus, the Project would not represent a substantial or significant growth as compared to projected growth.

**b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**

**Less Than Significant With Mitigation Incorporated.** Both short-term impacts occurring during construction and long-term effects related to the ongoing operation of the Project are discussed. This analysis focuses on two levels of impacts: pollutant emissions and pollutant concentrations. "Emissions"

refer to the quantity of pollutants released into the air. "Concentrations" refer to the amount of pollutant material per volumetric unit of air, as measured in parts per million (ppm) or micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ).

### Construction – Regional Emissions

Construction-related emissions were estimated using the SCAQMD's CalEEMod 2013.2.2 model using assumptions from the Project's developer, including the Project's construction schedule of 26 months. Key assumptions include export of up to 78,000 cubic yards of soils: site preparation (two weeks), grading phase (3 months), building construction phase (2 months), paving (1 month), and architectural coatings (18 months).

As shown on Table IV-2, the construction of the Project would produce VOC, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions that do not exceed the SCAQMD's regional thresholds. However, prior to mitigation, NO<sub>x</sub> emissions during any concurrent grading and building construction processes would exceed the thresholds for this ozone precursor. As a result, prior to mitigation, construction of the Project could contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). However, with implementation of Mitigation Measures 3-1 through 3-5, Project impacts related to regional construction emissions would be less than significant (refer to Table IV-4 shown after the list of Air Quality mitigation measures).

**Table IV-2**  
**Estimated Daily Construction Emissions – Unmitigated**

Construction Phase Year	Pounds Per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
2017	16	189	134	<1	21	12
2018	18	201	151	<1	19	13
2019	4	20	21	<1	2	1
2020	4	18	21	<1	1	1
<b>Maximum Regional Total</b>	17	291	151	<1	21	13
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	Yes	No	No	No	No
<b>Maximum Localized Total</b>	-	189	135	<1	15	11
Localized Significance Threshold	--	108	1,048	--	8	5
Exceed Threshold?	N/A	Yes	No	N/A	Yes	Yes

Source: DKA Planning, 2016 based on CalEEMod 2013.2.2 model runs. LST analyses based on 2-acre site with 25-meter distances to receptors in Central Los Angeles source receptor area. Refer to Appendix B.

### Construction – Local Emissions

In terms of local air quality, the Project would produce emissions that do not exceed the SCAQMD's recommended localized standards of significance for CO during the construction phase. However, construction activities could produce NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions that would exceed localized thresholds recommended by the SCAQMD, primarily from vehicle exhaust and fugitive dust emissions from off-road construction vehicles during the potential concurrent grading and building construction phases (refer to Table IV-2). However, with implementation of Mitigation Measures 3-1 through 3-5, Project impacts related to localized construction emissions would be less than significant (refer to Table IV-4 shown after the list of Air Quality mitigation measures).

### Operation – Regional Emissions

Table IV-3 shows the estimated daily emissions associated the operational phase of the Project. As shown, operation of the Project would not produce VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub> emissions in excess of SCAQMD's thresholds. Therefore, Project impacts related to operational pollutant emissions would be less than significant.

**Table IV-3**  
**Estimated Daily Project Operational Emissions**

Emissions Source	Pounds Per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Area Source	2	<1	3	<1	<1	<1
Energy Source	<1	<1	<1	<1	<1	<1
Mobile Source	1	4	17	<1	3	1
<b>Total Regional Emissions</b>	4	5	21	<1	3	1
<i>Regional Significance Threshold</i>	55	55	550	150	150	55
<b>Exceed Threshold?</b>	No	No	No	No	No	No
<b>Total Localized Emissions</b>	3	<1	3	<1	<1	3
<i>Localized Significance Threshold</i>	-	108	1,048	-	2	-
<b>Exceed Threshold?</b>	N/A	No	No	N/A	No	N/A

*Source: DKA Planning 2015 based on CalEEMod 2013.2.2 model runs. LST analysis based on 2-acre site with 25-meter distances to receptors in Central Los Angeles source receptor area.*

c) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative threshold for ozone precursors)?

**Less Than Significant With Mitigation Incorporated.** The SCAQMD's *CEQA Air Quality Handbook* identifies several methods to determine the cumulative significance of land use projects (i.e., whether the

contribution of a project's emissions is cumulatively considerable). However, the SCAQMD no longer recommends the use of these methodologies. Instead, the SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable.<sup>7</sup> The SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

As discussed in response to Checklist Question 3b, with mitigation, the Project would not produce VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub> emissions in excess of SCAQMD's significance thresholds. As such, the Project's contribution to cumulative pollutant emissions would not be considerable.

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

**Less Than Significant Impact.** SCAQMD recommends an evaluation of potential localized CO impacts when vehicle-to-capacity (V/C) ratios are increased by two percent or more at intersections with a level of service (LOS) of C or worse, and/or when the LOS for an intersection worsens from C to D or worse. Traffic volumes that meet these criteria have the potential to result in CO "hotspots." The Project includes development of 42 single-family residential homes, which would generate approximately 32 AM peak-hour trips, 42 PM peak-hour trips, and 400 daily trips. Project traffic would not change LOS at any of the intersections near the Project site (refer to Table IV-36 later in this section). Thus, Project traffic would not have the potential to result in CO hotspots. Additionally, as discussed in response to Checklist Question 3b, the Project would not produce VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub> emissions in excess of SCAQMD's significance thresholds. As such, the Project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, Project impacts related to this issue would be less than significant.

**e) Would the project create objectionable odors affecting a substantial number of people?**

**No Impact.** The Project includes development of 42 single-family residential homes on the Project site and would not generate any odors. Therefore, the Project would not create objectionable odors affecting a substantial number of people.

**Mitigation Measures (Air Quality)**

To ensure that the Project would not result in any significant impacts related to construction emissions, the following mitigation measures are required (refer to Table IV-4):

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<sup>7</sup> *White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix D, p. D-3.*



- 3-1: All off-road construction equipment greater than 50 hp shall meet U.S. EPA Tier 4 emission standards, where available, to reduce NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions at the Project site. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- 3-2: Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained, the Lead Agency shall require trucks that meet U.S. EPA 2007 model year NO<sub>x</sub> emissions requirements.
- 3-3: At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided.
- 3-4: Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at: <http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-dieselenines&parent=vehicle-engine-upgrades>.
- 3-5: Construction activities shall comply with SCAQMD Rule 403, including the following measures:
- o Apply water to disturbed areas of the site three times a day
  - o Require the use of a gravel apron or other equivalent methods to reduce mud and dirt trackout onto truck exit routes
  - o Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM generation.
  - o Limit soil disturbance to the amounts analyzed in the Final MND.
  - o All materials transported off-site shall be securely covered.
  - o Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
  - o Traffic speeds on all unpaved roads to be reduced to 15 mph or less.

**Table IV-4**  
**Estimated Daily Construction Emissions – Mitigated**

Construction Phase Year	Pounds Per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
2017	4	41	111	<1	7	4
2018	5	43	139	<1	5	3
2019	2	5	21	<1	<1	<1
2020	2	5	21	<1	<1	<1
<b>Maximum Regional Total</b>	5	43	139	<1	7	4
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
<b>Maximum Localized Total</b>		13	112	<1	3	2
Localized Significance Threshold	--	108	1,048	--	8	5
Exceed Threshold?	N/A	No	No	N/A	No	No

*Source: DKA Planning, 2016 based on CalEEMod 2013.2.2 model runs. LST analyses based on 2-acre site with 25-meter distances to receptors in Central Los Angeles source receptor area. Refer to Appendix B.*

### Cumulative Impacts

As stated previously, SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also would be considered cumulatively considerable. Individual projects that generate emissions not in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. As discussed in response to Checklist Question 3b, with mitigation, the Project would not generate emissions in excess of SCAQMD's significance thresholds. As such, the Project would not contribute considerably to any potential cumulative impact. Therefore, cumulative impacts related to air quality would be less than significant.

## 4. BIOLOGICAL RESOURCES

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

**Less Than Significant With Mitigation Incorporated.** A Biological Resources Report was prepared for the Project by SWCA Environmental Consultants (SWCA) to determine the presence or absence of sensitive natural resources (including special status species) at the Project site (refer to Appendix C).

## Methods

SWCA conducted a review of the Project site, reviewing aerial photographs and records of plant and wildlife occurrences in the U.S. Geological Survey Los Angeles 7.5-minute topographic quadrangle where the Project site is located. Plant and wildlife occurrences were queried for the quadrangle from the California Natural Diversity Database (CNDDDB) and the California Native Plant Society's Rare Plant Inventory.<sup>8,9</sup> Both databases track special-status and sensitive species, including species that are listed under the State and Federal Endangered Species Acts; considered rare, sensitive, or of special concern to California Department of Fish and Wildlife (CDFW), the U.S. Fish and Wildlife Service, Bureau of Land Management (BLM), U.S. Forest Service (USFS); or are on other watch lists.

Before conducting a field survey SWCA biologists reviewed aerial photographs of the Project site and arborist's reports for the Project.<sup>10,11</sup> Based on the aerial photographs showing both visible and infrared spectra, a preliminary map of plant communities and land cover was created in a Geographic Information System (GIS) using ESRI ArcMap version 10.3.4. The preliminary map was loaded onto a Trimble™ geographic positioning system (GPS) unit with sub-meter accuracy and modified in the field. The field survey of the Project site was conducted on July 22, 2016 by SWCA biologist Alex Beakes. During the survey, Mr. Beakes mapped the plant communities and land cover present using a minimum mapping unit size of 0.25 acre, identified plants at the site, recorded any evidence of wildlife use such as dens or trails, and took representative photographs.

## Results

The Project site is characterized by hilly topography, which has a high point in the approximate center of the site. Elevation at the site ranges from approximately 450 to 525 feet above mean sea level. The western and northern edges of the site are bounded by sidewalk and a strip of vegetation between the sidewalk and two- and four-lane streets. An elementary school with buildings and sports fields is located across the street to the west and north of the site. Urban residential development abuts the Project site's

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<sup>8</sup> California Natural Diversity Data Base (CNDDDB). 2016. Data retrieved using Rarefind 5 [web application]. California Department of Fish and Game, Sacramento. Available at: <http://www.dfg.ca.gov/biogeodata/cnddb/mapsanddata.asp>. Accessed October 2016.

<sup>9</sup> CNPS. Rare Plant Program. 2016. Inventory of Rare and Endangered Plants (online edition, v8-02). California Native Plant Society, Sacramento, CA. Website <http://www.rareplants.cnps.org>. Accessed October 2016/

<sup>10</sup> Arborgate Consulting, Inc. 2015. Tree Preservation Report. Prepared for Patrick Donahue. Clearwater Communities. Prepared by Arborgate Consulting, Inc., Greg Applegate. March 2015.

<sup>11</sup> Arborgate Consulting, Inc. 2015. Addendum to Tree Preservation Report. Prepared for Patrick Donahue, Clearwater Communities. Prepared by Arborgate Consulting, Inc., Greg Applegate. October 2015.

eastern and southern edges. Current imagery shows areas at the hilltop and southern portion of the property that have previously been developed, although there are no buildings currently on the Project site. Historical imagery shows one building at the top of the hill, a second building at the southern foot of the hill, and access roads or driveways. Trees are visible in the images around the site perimeter, and concentrated in the north. An unauthorized encampment consisting of a single tent was located at the top of the hill.

### *Sensitive Species*

A total of 27 plant species were recorded during the field survey, which were a mix of native species, plants often used in landscaping, and weedy non-native species. Only four native species were recorded (refer to Table IV-5). Numerous Southern California black walnut (*Juglans californica*) trees were recorded, around the site perimeter and concentrated on the north-facing slope in the northern portion of the site. This species is assigned a California Rare Plant Rank (CRPR) of 4.2 by the California Native Plant Society, meaning that it has a limited distribution or occurs infrequently through a broader area in California. Plants with a ranking of 1 or 2 meet the definition of rare, threatened, or endangered, and require evaluation under CEQA.

**Table IV-5  
Plants Recorded at the Project Site**

Family	Scientific Name	Common Name	Life Form	Status
Aizoaceae	<i>Carpobrotus</i> sp.	ice plant	shrub	invasive
Anacardiaceae	<i>Malosma laurina</i>	laurel sumac	shrub	native
	<i>Schinus terebinthifolius</i>	Brazilian pepper tree	tree	invasive
Apocynaceae	<i>Vinca major</i>	periwinkle	perennial herb	invasive
Arecaceae	<i>Phoenix canariensis</i>	Canary island date palm	perennial herb	invasive
	<i>Washingtonia robusta</i>	Washington fan palm	tree	invasive
Asteraceae	<i>Centaurea melitensis</i>	Tocalote	annual herb	invasive
	<i>Helminthotheca echinoides</i>	bristly ox-tongue	annual herb	invasive
Bignoniaceae	<i>Jacaranda mimosifolia</i>	jacaranda	tree	non-native
Chenopodiaceae	<i>Chenopodium murale</i>	nettle leaf goosefoot	annual herb	non-native
	<i>Salsola tragus</i>	Russian thistle	annual herb	invasive
Euphorbiaceae	<i>Ricinus communis</i>	castor bean	tree	invasive
Fabaceae	<i>Acacia melanoxydon</i>	blackwood acacia	tree	invasive
Juglandaceae	<i>Juglans californica</i>	Southern California black walnut	tree	native
Malvaceae	<i>Malva parviflora</i>	cheeseweed	annual herb	non-native
Myrtaceae	<i>Eucalyptus globulus</i>	blue gum eucalyptus	tree	invasive
Oleaceae	<i>Fraxinus uhdei</i>	Shamel ash	tree	invasive
	<i>Olea europaea</i>	olive tree	tree	invasive
Plumbaginaceae	<i>Plumbago auriculata</i>	cape leadwort	shrub	non-native
Poaceae	<i>Avena</i> sp.	wild oat	grass	invasive
	<i>Bromus diandrus</i>	ripgrut brome	grass	invasive
	<i>Pennisetum setaceum</i>	fountaingrass	grass	invasive
Polygonaceae	<i>Eriogonum fasciculatum</i>	California buckwheat	shrub	native
Rosaceae	<i>Heteromeles arbutifolia</i>	Toyon	tree	native
Simaroubaceae	<i>Ailanthus altissima</i>	Tree of heaven	tree	invasive
Solanaceae	<i>Nicotiana glauca</i>	tree tobacco	tree	invasive
Ulmaceae	<i>Ulmus parvifolia</i>	Chinese elm	shrub	non-native

Source: SWCA, 2016. Refer to Appendix C.

The database review returned 13 species of plants and 9 species of wildlife with recorded occurrences in the records search area (approximately 60 square miles; refer to Table IV-6). Of these, only one was considered to have the potential to occur at the site: hoary bat (*Lasiurus cinereus*). Hoary bat is included on the CDFW list of sensitive animals because it is listed as a Medium priority species by the Western Bat Working Group (WBWG). The Medium designation indicates "a level of concern that should warrant closer evaluation, more research, and conservation actions of both the species and possible threats. A lack of meaningful information is a major obstacle in adequately assessing these species' status and should be considered a threat."<sup>12</sup> The hoary bat is solitary and roosts primarily in foliage of both coniferous and deciduous trees, near the ends of branches, 10 to 40 feet above the ground. Many kinds of trees are used, and roost sites are usually hidden from above by canopy but open below. Roosts are usually at the edge of a clearing. Hoary bats frequently change roost sites and have low roost fidelity. Hoary bat is a migratory species, which in Southern California winters near the coast and breeds further inland. It has the potential to occur at the Project site during the winter season (August 1 to February 28). Trees at the Project site may provide roosting habitat for this species.

#### Discussion

Two species with local protections or considered sensitive were identified as occurring or having the potential to occur at the Project site: Southern California black walnut and hoary bat.

#### *Southern California Black Walnut*

Southern California black walnut trees are addressed in the Los Angeles Municipal Code (CRPR) and are ranked as a CRPR 4.2. The Southern California black walnut tree is designated as a protected tree in Section 96.303.5 of the LAMC. The CRPR rank of 4.2 means that the species has limited distribution; no specific protections are afforded by this ranking. As discussed in response to Checklist Question 1(b), 102 Southern California black walnuts are located on the Project site, and up to 39 of these trees would be removed as part of the Project. However, as outlined previously in Mitigation Measure 1-2, the Project Applicant would be required to replace the protected trees on the Project site at a 4:1 ratio. Implementation of Mitigation Measure 1-2 and 1-4 would ensure that Project impacts related to protected trees would be less than significant.

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<sup>12</sup> *The Western Bat Working Group (WBWG) is comprised of agencies, organizations and individuals interested in bat research, management and conservation from the 13 western states and provinces. The goals are (1) to facilitate communication among interested parties and reduce risks of species decline or extinction; (2) to provide a mechanism by which current information on bat ecology, distribution and research techniques can be readily accessed; and (3) to develop a forum to discuss conservation strategies, provide technical assistance and encourage education programs. Species are ranked as High, Medium, or Low Priority in each of 10 regions in western North America. The CNDDB tracks bat species that are at least Low- Medium Priority in California. More information is available at: <http://www.wbwg.org>.*

**Table IV-6**  
**Sensitive Species With Recorded Occurrences in the**  
**Los Angeles U.S. Geological Survey 7.5-Minute Topographic Quadrangle**

Name	Special Status	General Habitat Microhabitat	Potential to Occur at the Project
<b>Plants</b>			
Catalina mariposa lily <i>Calochortus catalinae</i>	CRPR 4.2	Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland.	<b>None.</b> No suitable habitat is present.
Davidson's saltscale <i>Atriplex serenana</i> var. <i> davidsonii</i>	CRPR 1B.2	Coastal bluff scrub, coastal scrub. Alkaline soil.	<b>None.</b> No suitable habitat is present. Likely extirpated from L.A. County.
Greata's aster <i>Symphotrichum greatae</i>	CRPR 1B.3	Broadleaved upland forest, chaparral, cismontane woodland, lower montane coniferous woodland, riparian woodland. Mesic canyons.	<b>None.</b> No suitable habitat is present.
Hubby's phacelia <i>Phacelia hubbyi</i>	CRPR 4.2	Chaparral, coastal scrub, valley and foothill grassland. Gravelly and rocky areas; talus slopes.	<b>None.</b> No suitable habitat is present.
Los Angeles sunflower <i>Helianthus nuttallii</i> ssp. <i> parishii</i>	CRPR 1A	Freshwater marsh, marsh and swamp, salt marsh, wetlands.	<b>None.</b> No suitable habitat is present.
Mesa horkelia <i>Horkelia cuneata</i> var. <i> puberula</i>	CRPR 1B.1	Chaparral, cismontane woodland, coastal scrub. Sandy or gravelly sites.	<b>None.</b> No suitable habitat is present.
Monkey-flower savory <i>Clinopodium mimuloides</i>	CRPR 4.2	Chaparral, North Coast coniferous forest. Stream banks, mesic sites.	<b>None.</b> No suitable habitat is present.
Parish's gooseberry <i>Ribes divaricatum</i> var. <i> parishii</i>	CRPR 1A	Riparian woodlands. Willow swales in riparian habitats.	<b>None.</b> No suitable habitat is present.
Plummer's mariposa-lily <i>Calochortus plummerae</i>	CRPR 4.2	Chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, valley and foothill grassland. Occurs on rocky and sandy sites, usually of granitic or alluvial material. Can be very common after fire.	<b>None.</b> No suitable habitat is present.
Prostrate vernal pool navarretia <i>Navarretia prostrata</i>	CRPR 1B.1	Coastal scrub, meadow and seep, valley and foothill grassland, vernal pools, wetlands. Alkaline soils in grassland, or in vernal	<b>None.</b> No suitable habitat is present.

**Table IV-6  
Sensitive Species With Recorded Occurrences in the  
Los Angeles U.S. Geological Survey 7.5-Minute Topographic Quadrangle**

Name	Special Status	General Habitat Microhabitat	Potential to Occur at the Project
		pools. Mesic, alkaline sites.	
Robinson's pepper-grass <i>Lepidium virginicum</i> var. <i>robinsonii</i>	CRPR 4.3	Chaparral, coastal scrub. Dry soils, shrubland.	None. No suitable habitat is present.
Round-leaved filaree <i>California macrophylla</i>	CRPR 1B.2	Cismontane woodland, valley and foothill grassland. Clay soils.	None. No suitable habitat is present.
Vernal barley <i>Hordeum intercedens</i>	CRPR 3.2	Coastal dunes, coastal scrub, valley and foothill grassland, vernal pools. Saline flats and depressions.	None. No suitable habitat is present.
<b>Reptiles and Amphibians</b>			
Coast horned lizard <i>Phrynosoma blainvillii</i>	SSC	Coastal sage scrub and chaparral in arid and semiarid climates. Prefers friable, rocky, or shallow sandy soils.	None. No suitable habitat is present.
<b>Birds</b>			
Bank swallow <i>Riparia riparia</i>	ST	Riparian scrub, riparian woodland. Nests in steep sand, dirt, or gravel banks, along the edge of inland water, along coast, in gravel pits, or road embankments.	None. No suitable habitat is present.
Burrowing owl <i>Athene cunicularia</i>	SSC	Open, dry annual or perennial grasslands, deserts and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably the California ground squirrel.	None. No suitable habitat is present.
Least Bell's vireo <i>Vireo bellii pusillus</i>	FE / SE	Riparian forest, riparian scrub, riparian woodland. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, mulefat, mesquite	None. No suitable nesting or foraging habitat present.
Southwestern willow flycatcher <i>Empidonax traillii extimus</i>	FE / SE	Riparian woodland. Breeds in relatively dense riparian tree and shrub communities associated with rivers, swamps, and other wetlands including lakes and reservoirs; habitat patches must be at least	None. No suitable nesting or foraging habitat present.



**Table IV-6  
Sensitive Species With Recorded Occurrences in the  
Los Angeles U.S. Geological Survey 7.5-Minute Topographic Quadrangle**

Name	Special Status	General Habitat Microhabitat	Potential to Occur at the Project
		0.25 acres in size and at least 30 feet wide.	
<b>Mammals</b>			
American badger <i>Taxidea taxus</i>	SSC	Found in arid, open habitats, particularly grasslands, savannahs, mountain meadows, and desert scrub openings. Needs friable soils for digging and open, uncultivated ground; occurs at low to moderate slopes; has been associated with Joshua tree woodland and pinyon-juniper habitats.	None. No suitable habitat is present.
Big free-tailed bat <i>Nyctinomops macrotis</i>	SSC	Rocky terrain; bare rock/talus/scree, cliff, desert, woodland - hardwood. Roosts in rock crevices (vertical or horizontal) in cliffs; also in buildings, caves, and occasionally tree holes.	Low. If cavities are present in trees on-site, there is a very low potential for this species to be present.
Hoary bat <i>Lasiurus cinereus</i>	None	Forages over a wide range of habitats, but prefers open habitats with access to trees for roosting, and water. Ranges throughout most of California. Primarily roosts in trees and foliage.	Moderate. Trees on site may provide some roost sites. The Arroyo Seco wash, approximately 2 miles to the northwest, is the closest substantial semi-natural water source.
Western mastiff bat <i>Eumops perotis californicus</i>	SSC	Found in the southwestern United States, generally away from human development; this species can utilize a variety of habitat types including chaparral, oak woodland, pine forests, agricultural areas and desert washes. Roosts primarily in vertical rock crevices on cliffs; common in open habitats when foraging.	None. No suitable roosting habitat is present.
<p><b>Key:</b> FC - Federal candidate for ESA listing, PE - Federally endangered, None - species included for other reasons (see the Special Animals List at <a href="http://www.dfg.ca.gov/wildlife/nongame/list.html">http://www.dfg.ca.gov/wildlife/nongame/list.html</a>), SE - State endangered, SSC - Species of Special Concern, ST - State threatened.                      CRPR - California Rare Plant Rank. CRPR Rankings:                      I.A. : Presumed extinct in California</p>			

**Table IV-6**  
**Sensitive Species With Recorded Occurrences in the**  
**Los Angeles U.S. Geological Survey 7.5-Minute Topographic Quadrangle**

Name	Special Status	General Habitat Microhabitat	Potential to Occur at the Project
1B. ___: Rare, threatened, or endangered in California and elsewhere.			
2. ___: Rare, threatened, or endangered in California, but more common elsewhere.			
3. ___: Needs review (information lacking).			
4. ___: Limited distribution (Watch List).			
___1: Seriously threatened in California.			
___2: Fairly threatened in California.			
___3: Not very threatened in California.			
Source: SWCA, 2016. Refer to Appendix C.			

### **Hoary Bat**

Hoary bat is ranked as a Medium priority species by the WBWG and tracked by the CNDDDB because there is limited information available on this species. The bat's ranking provides no specific protections. This species has the potential to occur at the Project site between August 1<sup>st</sup> and February 28<sup>th</sup>; between March 1<sup>st</sup> and July 31<sup>st</sup>, the bat moves inland and northward away from the Project site area to its breeding grounds. The removal of individual trees at the Project site would not substantially change available habitat for this species, because of the wide range of trees available for roosting that would remain at the Project site and in the surrounding area. Significant impacts to individual hoary bats could occur if individual bats are roosting on the trees when the trees are cut. Removing large trees with potential roosting habitat when hoary bats are absent (March 1<sup>st</sup> through July 31<sup>st</sup>) would avoid this impact. If large trees are removed between August 1<sup>st</sup> and February 28<sup>th</sup>, a nocturnal survey for roosting bats should be conducted by a qualified bat biologist. If evidence of bats is present, then removal of occupied roost trees shall not occur until the biologist determines that the roost is no longer in use through repeated nocturnal surveys. Requirements to avoid roosting bats are included as Mitigation Measure 4-1, implementation of which would ensure that the Project would not result in any significant impacts related to the hoary bat.

### **Nesting Birds**

The Project site does contain 174 trees, 98 of which would be removed as part of the Project. Depending on the time of year that the Project site is developed, nesting birds (which are protected by law) could be using the trees on the Project site. As such, the Project Applicant would be required to implement Mitigation Measure 4-2 to ensure that no significant impacts related to nesting birds would occur. Therefore, impacts related to nesting birds would be less than significant.

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

**Less Than Significant Impact.** As discussed previously in response to Checklist Question 4(a), a Biological Resources Report was prepared for the Project by SWCA to determine the presence or absence of sensitive natural resources (including sensitive natural communities) at the Project site.

#### **Sensitive Natural Communities**

Several classification systems have been used to describe natural communities in California; the current most widely accepted system, and the one recommended by CDFW is *A Manual of California Vegetation* (MCV), the most current version of which is maintained online.<sup>13</sup> The MCV provides descriptions of more than 400 distinct vegetation alliances, which are plant communities dominated by native plant species. Membership rules for over 90 different woodland alliances are detailed, as well as numerous shrubland alliances and herbaceous alliances.

Since the inception of the State's Natural Heritage program in 1979, CDFW has maintained a list of special status (i.e. sensitive) natural communities in the state.<sup>14</sup> Sensitive natural communities are those with a ranking of 1, 2, or 3, which is assigned based on rarity inside state borders, where 1 is the rarest. The CDFW maintains a crosswalk to translate different vegetation community mapping methods to the corresponding MCV alliance. The CDFW describes special status natural communities as follows:

*Special status natural communities are communities that are of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects. These communities may or may not contain special status species or their habitat. The most current version of the Department's List of California Terrestrial Natural Communities indicates which natural communities are of special status given the current state of the California classification.*<sup>15</sup>

<sup>13</sup> CNPS. 2016. *A Manual of California Vegetation, Online Edition*. <http://www.cnps.org/cnps/vegetation/>. Accessed on July 28, 2016. California Native Plant Society, Sacramento, CA

<sup>14</sup> CDFW. 2016. *Natural Communities*. <https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities>. Accessed on July 28, 2016.

<sup>15</sup> CDFW. 2009. *Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened and Endangered Plants and Natural Communities*. California Department of Fish and Wildlife. Available from: <http://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=107494&inline>.

The MCV also includes a few types of communities called semi-natural stands that are dominated by non-native species; these are included in the MCV because they have potential value as habitat for native species of plants and wildlife. Most vegetation communities dominated by non-native species are not included in the MCV because their potential habitat values are limited.

#### **Water Bodies under State or Federal Jurisdiction**

There are no water bodies at the Project site. As such, no further discussion of this issue is required.

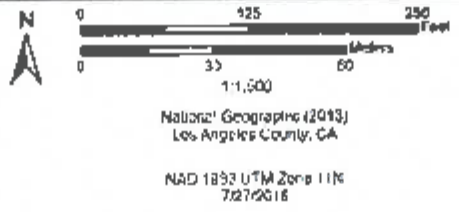
#### ***Vegetation Communities and Land Cover***

Vegetation at the Project site is generally characterized as consisting of a mix of native plant species, landscape plants, and weedy non-native plants, some of which are invasive species (refer to Table IV-5). No buildings were present. Substantial amounts of trash were observed (and mapped) throughout the Project site, especially on the graded pad at the southern end of the site.

There were no areas dominated by native species where Southern California black walnut constituted more than 50 percent relative cover in the canopy. Therefore, no areas met the definition of *Juglans californica* Woodland Alliance as described in the MCV, which is considered a sensitive natural community by CDFW. No areas of the Project site were dominated by native species. Thus, the Project site was mapped as various other land cover types, including Bare Soil/Paved, Mixed Woodland, Non-native Grassland, and Debris (refer to Figure IV-1).

The Bare Soil/Paved area consisted of graded areas where building foundations and driveways were built in the past, including unpaved areas, degraded asphalt, and degraded concrete. The Mixed Woodland consisted of areas of trees of various species, including Southern California black walnut and several non-native species (refer to Table IV-5). The Non-native Grassland was comprised of a mix of non-native weedy and invasive grasses that commonly grow in unmaintained areas, with scattered small shrubs and other herbaceous plants. The Debris was comprised of shingles, boards, chairs, tires, and other refuse.

The vegetation mapped on the Project site does not meet the criteria for a sensitive natural community, nor are the native trees within mixed woodlands considered special status species under state or federal regulations. Therefore, Project impacts related to sensitive natural communities would be less than significant.



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Source: SWCA Environmental Consultants, 2016.

c) **Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

**No Impact.** The Project site is an infill site that is not currently developed with any structures and does not contain any wetlands or other areas subject to the jurisdiction of the U.S. Army Corps of Engineers, CDFW, or State Water Resources Control Board under the Clean Water Act (refer to response to Checklist Question 4(c)). Therefore, no impacts related to this issue would occur.

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

**No Impact.** The term "wildlife movement corridor" implies a continuous, unidirectional movement of individual animals. Although wildlife movement corridors may sometimes be used in this way, the most important functions of a wildlife movement corridor are the long-term dispersal of genetic material between population centers and the maintenance of balanced, viable populations in these areas. The term "habitat linkage"—described as "an undisturbed habitat parcel that connects two or more reserve parcels (generally public land holdings) with habitat suitable for movement of mobile terrestrial organisms between the reserve parcels"—better characterizes this concept. Habitat linkages are best conceived as large "plains" of habitat rather than as narrow travel routes, which offer the greatest possible potential of facilitating short- and long-term wildlife movement between parcels. The habitat linkages serve to both permit movement between isolated populations and maintain an integrated, functioning landscape-wide ecosystem.<sup>16</sup>

In general a habitat linkage, referred to here as a wildlife corridor, is a strip of land that connects two or more, larger land areas and is free of barriers that would seriously curtail or prevent wildlife passage. These corridors can serve as useful habitat in their own right, or can serve as travel lanes for seasonal movements of wildlife. Their value depends upon width, habitat type and structure, nature of surrounding habitat, human use patterns, and other factors. Typically, a wildlife corridor provides refuge and ease of movement, and often follows ridgelines or drainages. Wildlife movement corridors are important for the free movement of animals between population centers, for access to food and water sources during drought, as escape routes from brush fires, and, in the longer term, for dispersal of genetic traits between population centers.

Human encroachment fragments natural habitats into smaller and more isolated units. In the process, it destroys habitat of many species, modifies habitat of others, and creates new habitat for yet others. Many

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<sup>16</sup> Lieberstein, T.A. 1989. *Reserve Design in the Santa Monica Mountains*. Master's thesis. California State University, Northridge

studies have indicated that, in general, habitat size is the most important factor in determining land vertebrate species diversity.<sup>17</sup> The degree of habitat isolation and percentage of vegetative cover are other major factors in species variety and abundance. Wildlife corridors can prevent local extinctions by connecting relatively small open space preserves, thereby allowing gene flow and providing for a wide diversity of genetic traits throughout the interconnected populations.

Nursery sites are generally considered to include specific locations used by groups of wildlife to bear and care for young. Salmon spawning streams, maternity colonies of bats, and nesting areas for colonially nesting birds are among the types of sites typically evaluated.

No animal dens, trails, or other signs of regular use were observed at the Project site. Many species of wildlife typical of urban and suburban areas, such as coyote (*Canis latrans*), Virginia opossum (*Didelphis virginiana*), and striped skunk (*Mephitis mephitis*), are primarily nocturnal and adept at avoiding humans; they may have been present but undetected. Compared to the surrounding residential areas, the Project site may provide a refuge for common urban and suburban wildlife.

The Project site lacks the features of a wildlife movement corridor or native wildlife nursery site, as defined above. The surroundings are highly developed and urbanized, with isolated natural areas that do not form a connected corridor between large areas of habitat. The Project site has evidence of regular human presence, which would also generally deter wildlife from using it. Approximately one-half mile to the southeast of the site a major rail corridor running southwest to northeast acts as a barrier to wildlife movement. Approximately one mile from the Project site, Interstates 10 and 710 form a major barrier to southward and eastward movement. Ascot Park, located approximately 0.2 miles west of the Project site, is the nearest large area of semi-natural habitat. Although it is relatively close to the Project site, wildlife moving through would then be blocked by the rail and interstate corridors.

The Project site is located in a fairly urbanized area of the City and is surrounded by existing residential development and roadway and utility infrastructure. The Project site is an infill site that is not currently developed with any structures and contains some vegetation, but given the developed nature of the Project area, the area is not used as a significant wildlife corridor. Additionally, there are no waterways in the Project area that are used by migratory fish, and there are no wildlife nursery sites in the area. Therefore, the Project would not 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, and no impacts related to this issue would occur.

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<sup>17</sup> Adams, J. W., and L.E. Dove 1989. *Wildlife Reserves and Corridors in the Urban Environment: A Guide to Ecological Landscape Planning and Resource Conservation*. National Institute for Urban Wildlife, Columbia, Md.

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

**Less Than Significant With Mitigation Incorporated.** As discussed previously, a Tree Preservation Report was prepared for the Project that identified 102 protected trees measuring 4-inch trunk diameter or larger and 72 non-protected measuring 8-inch trunk diameter or larger (refer to Appendix A). Of the 102 protected trees, 63 to 65 would be retained in place, and 37 to 39 would be removed. Of the 72 non-protected trees, 13 would be retained in place, and 59 would be removed. However, as required by the City and as outlined in Mitigation Measures 4-3 and 4-4, the removed non-protected trees would be replaced on the Project site at a 1:1 ratio, and the removed protected trees would be replaced on the Project site at a 4:1 ratio, respectively. Therefore, with implementation of these mitigation measures, Project impacts related to trees would be less than significant.

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

**No Impact.** The Project site is not subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan. Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

#### **Mitigation Measures (Biological Resources)**

To ensure that the Project would not result in any significant impacts related to nesting species, the following mitigation measure is required:

4-1) To avoid potential significant impacts to roosting bats, one of the following shall be implemented by the Project Applicant.

- Tree removal shall occur between March 1<sup>st</sup> and July 31<sup>st</sup>.

OR...

- If tree removal would occur between August 1<sup>st</sup> and February 28<sup>th</sup>/29<sup>th</sup>, the Project Applicant shall retain a qualified bat biologist to conduct a roosting bat survey. If evidence of bats is present, then removal of occupied roost trees shall not occur until the biologist determines that the roost is no longer in use through repeated nocturnal surveys. The results of the survey(s) shall be provided to the Department of Public Works prior to removal of any protected trees.



4-2: To avoid potential significant impacts to nesting birds, including migratory birds and raptors, one of the following shall be implemented by the Project Applicant:

- Conduct vegetation removal associated with construction from September 1<sup>st</sup> through January 31<sup>st</sup>, when birds are not nesting. Initiate grading activities prior to the breeding season (which is generally February 1<sup>st</sup> through August 31<sup>st</sup>) and keep disturbance activities constant throughout the breeding season to prevent birds from establishing nests in surrounding habitat (in order to avoid possible nest abandonment); if there is a lapse in activities of more than five days, pre-construction surveys shall be necessary as described in the bullet below.

OR...

- Conduct pre-construction surveys for nesting birds if vegetation removal or grading is initiated during the nesting season. A qualified wildlife biologist shall conduct weekly pre-construction bird surveys no more than 30 days prior to initiation of grading to provide confirmation on the presence or absence of active nests in the vicinity (at least 300 to 500 feet around the individual construction site, as access allows). The last survey should be conducted no more than three days prior to the initiation of clearance/construction work. If active nests are encountered, clearing and construction in the vicinity of the nests shall be deferred until the young birds have fledged and there is no evidence of a second attempt at nesting. A minimum buffer of 300 feet (500 feet for raptor nests) or as determined by a qualified biologist shall be maintained during construction depending on the species and location. The perimeter of the nest-setback zone shall be fenced or adequately demarcated with staked flagging at 20-foot intervals, and construction personnel and activities restricted from the area. Construction personnel should be instructed on the sensitivity of the area. A survey report by the qualified biologist documenting and verifying compliance with the mitigation and with applicable state and federal regulations protecting birds shall be submitted to the City and County, depending on within which jurisdiction the construction activity is occurring. The qualified biologist shall serve as a construction monitor during those periods when construction activities would occur near active nest areas to ensure that no inadvertent impacts on these nests would occur.

4-3: *Non-Protected Trees*

- Prior to issuance of any permit related to development of the Project, a plot plan shall be prepared for the Project, indicating the location, size, type, and general condition of all existing trees on the Project site and within the adjacent public right(s)-of-way.

- All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the Project site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net new trees located within the parkway of the adjacent public-right(s)-of-way may be counted toward replacement tree requirements.
- Removal or planting of any tree in the public right-of-way shall require approval of the Board of Public Works. All trees in the public right-of-way shall be provided in the current standards of the Urban Forestry Division of the Department of Public Works, Bureau of Street Services.

#### 4-4 *Protected Trees*

- All protected tree removals shall require approval from the Board of Public Works.
- A Tree Report shall be submitted to the Urban Forestry Division of the Bureau of Street Services, Department of Public Works, for review and approval prior to implementation of the Report's recommended measures.
- According to the City's Protected Tree Ordinance, a minimum of four protected trees (a minimum of 15 gallon in size) shall be planted for each protected tree that is removed. The size of each replacement tree shall measure at least one inch or more in diameter at a point one foot above the base, and not less than seven feet in height, measured from the base.
- In consultation with the Division of Urban Forestry, twenty-five percent of the protected trees removed shall be replaced with 15-gallon *Juglans californica*.
- The location of the trees planted for the purposes of replacing a removed protected tree shall be clearly indicated on the required landscape plan, which shall also indicate the replacement tree species and further contain the phrase "Replacement Tree" in its description.

#### 4-5 *Previously Removed Trees*

- The 8 qualifying previously removed protected trees shall be replaced at a ratio of one *Juglans californica* and three *Quercus* for each of the 8 trees, at a minimum of 15 gallon in size. The specific size and species of the trees to be planted as replacement for the protected trees being removed shall be determined by the Urban Forestry Division.

4-6 *All Trees*

- **Protection Barrier:** A protection barrier shall be installed around the construction area as shown on the map included in the Tree Preservation Report (refer to Appendix A). The barrier shall be 6-foot-high chain-link fencing. Twelve-inch-high silt fence shall be attached to the base of the fence with the bottom edge buried 1-2 inches. The barrier may be placed on the line shown on the map or closer to construction, but not further. The fencing shall be maintained in good repair throughout the duration of the Project, and shall not be removed, relocated, or encroached upon without permission of the arborist involved.
- **Storage of Materials:** There shall be NO storage of materials or supplies of any kind inside the area of the protection fencing. Concrete and cement materials, block, sand and soil shall not be placed within the drip-line of any tree to remain.
- **Fuel Storage:** Fuel storage shall NOT be permitted within 150 feet of any tree to be preserved. Refueling, servicing and maintenance of equipment and machinery shall NOT be permitted within 150 feet of protected trees.
- **Debris and Waste Materials:** Debris and waste from construction or other activities shall NOT be permitted outside the construction area. Wash down of concrete or cement handling equipment, in particular, shall NOT be permitted within 150 feet of protected trees.
- **Planting near Trees Designated for Protection:** Any digging within designated protection zones shall be done using supersonic air directly as the digging medium, by means of a nozzle, whose nominal rated input pressure (available from manufacturer's literature) must not exceed 130 psig (pounds per square inch at gage) unless otherwise approved. Nozzles designed for input above 130 psig can damage fine roots. Air compressors rated between 100 to 125 psig recommended.
- **Grade Changes:** Any grade changes within the protection radius listed should be approved by a Registered Consulting Arborist before construction begins, and precautions taken to mitigate potential injuries. Grade changes can be particularly damaging to trees. Even as little as two inches of fill can cause the death of a tree. Lowering the grade can destroy major portions of a root system.
- **Damages:** Any tree damages or injuries should be reported to the project arborist as soon as possible. Severed roots shall be cut cleanly to healthy tissue, using proper pruning tools. Broken branches or limbs shall be pruned according to International Society of Arboriculture Pruning Guidelines and ANSI A-300 Pruning Standards.

- **Preventive Measures:** Pruning of the tree canopies and branches should be done at the direction of the project arborist to remove any dead or broken branches, and to provide any necessary clearances for the construction work or equipment.

### **Cumulative Impacts**

With the exception of related project #3 shown on Table IV-38 included later in this document, all of the site of the related projects are either currently developed and/or have previously been developed. The site of related project #3 appears to be relatively undisturbed and could contain biological resources. Similar to the Project, the City will require the Project Applicant to conduct or have conducted an assessment of the site to determine the degree to which biological resources occur at the site and identified (if necessary) mitigation measures to reduce any potentially significant impacts to less than significant levels. As discussed previously, no sensitive natural communities or wetlands occur at the Project site, and the site is not within a migratory corridor. Similar to any site that includes trees, the Project has the potential to result in impacts related to nesting birds, roosting bats, and tree removal at the Project site. However, with implementation of Mitigation Measures 4-1 and 4-2 and Mitigation Measures 1-1 through 1-4, Project impacts related to biological resources would be less than significant. Any of the related projects that will involve the removal of trees also would be required to implement mitigation measures similar to those identified for the Project to reduce potential associated significant impacts to less than significant levels. For these reasons, cumulative impacts related to biological resources would be less than significant.

## **5. CULTURAL RESOURCES**

- a) **Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?**

**No Impact.** No historical resources are located at the Project site. No historical resources would be affected by the Project, and no impacts related to this issue would occur.

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

**Less Than Significant Impact.** The Project site is vacant and does not contain any structures, but has been developed in the past. Based on a records search conducted by the South Central Coast Information Center (refer to Appendix D), no archaeological sites have been recorded within the Project site. However, it is possible that unknown archaeological resources could exist at the Project site, given that significant archaeological resources have been identified in the Los Angeles area. As such, prior to Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying cultural resources or removing artifacts, human remains, bottles, and other cultural materials from the Project site. In addition, in the event that buried archaeological resources are exposed during Project construction, work within 50 feet of the find shall stop until a professional archaeologist, meeting the standards of the Secretary of the Interior, can identify

and evaluate the significance of the discovery and develop recommendations for treatment, in conformance with California Public Resources Code Section 21083.2. However, construction activities could continue in other areas of the Project site. Recommendations could include preparation of a Treatment Plan, which could require recordation, collection and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any Native American remains shall be treated in accordance with state law. Through compliance with these requirements, potential Project impacts to unknown archaeological resources would be less than significant.

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

**Less Than Significant Impact.** A records search was conducted with the Los Angeles County Natural History Museum to determine the likelihood for unique paleontological resources to occur at the Project site (refer to Appendix D). The records search revealed that no paleontological resources are known to exist at the Project site. However, fossils have been found in the sedimentary deposits that exist within the Project area and at the Project site.<sup>18</sup> Thus, it is possible that unknown resources could be encountered during the Project's excavation phase. However, prior to Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying paleontological or unique geologic resources or sites from the Project site. In addition, in the event that paleontological resources or sites, or unique geologic features are exposed during Project construction, work within 50 feet of the find shall stop until a professional paleontologist can identify and evaluate the significance of the discovery and develop recommendations for treatment. However, construction activities could continue in other areas of the Project site. Recommendations could include a preparation of a Treatment Plan, which could require recordation, collection, and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any paleontological resources or sites, or unique geologic features shall be treated in accordance with State Law. Through compliance with these requirements, potential Project impacts to unknown paleontological resources or sites, or unique geologic features would be less than significant.

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

**Less Than Significant Impact.** The Project site is vacant and does not contain any structures. No human remains are known to exist at the Project site. However, in accordance with the State's Health and Safety Code Section 7050.5, in the event of discovery or recognition of any human remains at the Project

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<sup>18</sup> Los Angeles County Natural History Museum, *Paleontological Resources Search Letter, October 27, 2014* (refer to Appendix D).

site, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Los Angeles County Coroner has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Through compliance with this regulation, potential Project impacts to human remains would be less than significant.

#### **Cumulative Impacts**

Impacts related to cultural resources are site-specific and are assessed on a site-by-site basis. All development in the City (including the proposed Project and the related projects) that involves ground-disturbing activities is required to implement the City's Standard Conditions of Approval related to archaeological and paleontological resources. Additionally, these projects are required to comply with State's Health and Safety Code Section 7050.5 in the event of discovery or recognition of any human remains. Through compliance with existing requirements, cumulative impacts related to cultural resources would be less than significant.

## 6. GEOLOGY AND SOILS

a) **Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**

- (i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?**

**No Impact.** The Project site is not located within an Alquist-Priolo Earthquake Fault Zone, and no known faults exist on the Project site.<sup>19</sup> The fault closest to the Project site is the Upper Elysian Park fault, located approximately 0.8 mile from the Project site. Thus, the Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving 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 on the Project site. Therefore, no significant impacts related to this issue would occur.

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

**Less Than Significant Impact.** Given the Project site's location in a seismically active region, the Project site could experience seismic groundshaking in the event of an earthquake. However, the Project Applicant would be required to design and construct the Project in conformance to the most recently adopted Building Code and applicable recommendations made in a Final Geotechnical Report prepared for the Project. Conformance with the City's current Building Code requirements would minimize the potential for structural failure, injury, and loss of life during an earthquake event and thus, not cause or accelerate geologic hazards or expose people to substantial risk of injury. Therefore, Project impacts related to groundshaking would be less than significant.

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

**No Impact.** A portion of the Project site is delineated by the state to be conducive to liquefaction. However, according to the Geologic & Geotechnical Engineering Review prepared for the Project, following grading of the site that occurs during the Project's construction phase, the site would be underlain by compacted fill placed on dense older alluvium and bedrock, and liquefaction would not pose a threat to the Project site. Therefore, no significant impacts related to this issue would occur.

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<sup>19</sup> *Geologic & Geotechnical Engineering Review, GeoSoils Consultants, Inc. January 2015. (Refer to Appendix E.)*

(iv) **Landslides?**

**Less Than Significant Impact.** The Project site contains hillsides and is located in an area with known landslides.<sup>20</sup> However, slope stability analyses conducted at the Project site indicate factors of safety above minimum Building Code values. Additionally, the Project Applicant would be required to design and construct the Project in conformance to the LAMC and applicable recommendations made in a Final Geotechnical Report prepared for the Project. Conformance with the City's current Building Code requirements would minimize the potential for structural failure, injury, and loss of life during an earthquake event and thus, not cause or accelerate geologic hazards or expose people to substantial risk of injury. Therefore, Project impacts related to landslides would be less than significant.

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

**Less Than Significant Impact.** During the Project's construction phase, the Project developer would be required to implement SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site. Also, the Project developer would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during the construction phase. Additionally, during the Project's operational phase, most of the Project site would be developed with impervious surface, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. Thus, no significant impacts related to erosion would occur as a result of Project operation.

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<sup>20</sup> *Ibid*



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

**Less Than Significant Impact.** Considering that the Project site includes hillside areas and the Project would include cut and fill slopes, unstable soils could be encountered at the Project site. However, as discussed previously, the Project Applicant would be required to prepare (or have prepared) a Final Geotechnical Report that would address the building standards and recommendations that shall be followed in order to develop the Project building in accordance with building standards that apply to building within the types of soils found at the site, including areas prone to landslide. Through compliance with the City's building code and recommendations of a Final Geotechnical Report, impacts related to soil instability would be less than significant.

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

**Less Than Significant Impact.** According to Ray A. Eastman (refer to Appendix E), soils at the Project site have a high expansive potential. As stated previous, the Project Applicant would be required to prepare (or have prepared) a Final Geotechnical Report that would address the building standards and recommendations that shall be followed in order to develop the Project building in accordance with building standards that apply to building within the types of soils (including expansive soils) found at the site. Through compliance with the City's building code and recommendations of a Final Geotechnical Report, impacts related to expansive soils would be less than significant.

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

**No Impact.** The Project would connect to the City's existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. Thus, the Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. Therefore, no impacts related to this issue would occur.

#### **Cumulative Impacts**

Geotechnical impacts related to future development in the City involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. The impacts on each site are specific to that site and its users and would not be in common or contribute to (or shared with, in an additive sense) the impacts on other sites. In addition, development on each site is subject to uniform site development and construction standards that are designed to protect public safety. Therefore, cumulative geotechnical impacts related would be less than significant.

## 7. GREENHOUSE GAS EMISSIONS

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

**Less Than Significant Impact.** The analysis of Project impacts related to greenhouse gas (GHG) emissions is based on modeling results, prepared by DKA Planning, Inc. (refer to Appendix B).

### *Background*

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

GHG emissions that contribute to the greenhouse effect include:

- Carbon Dioxide (CO<sub>2</sub>) is released to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned. CO<sub>2</sub> emissions from motor vehicles occur during operation of vehicles and operation of air conditioning systems. CO<sub>2</sub> comprises over 80 percent of GHG emissions in California.<sup>21</sup>
- Methane (CH<sub>4</sub>) is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas and petroleum systems, stationary and mobile combustion, and wastewater treatment. Mobile sources represent 0.5 percent of overall methane emissions.<sup>22</sup>
- Nitrous Oxide (N<sub>2</sub>O) is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels. Mobile sources represent about 14 percent of N<sub>2</sub>O

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<sup>21</sup> California Environmental Protection Agency, *Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 11.*

<sup>22</sup> United States Environmental Protection Agency, *Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2003, April 2005 (EPA 430-R-05-003)*

emissions.<sup>23</sup> N<sub>2</sub>O emissions from motor vehicles generally occur directly from operation of vehicles.

- Hydrofluorocarbons (HFCs) are one of several high global warming potential (GWP) gases that are not naturally occurring and are generated from industrial processes. HFC (refrigerant) emissions from vehicle air conditioning systems occur due to leakage, losses during recharging, or release from scrapping vehicles at end of their useful life.
- Perfluorocarbons (PFCs) are another high GWP gas that are not naturally occurring and are generated in a variety of industrial processes. Emissions of PFCs are generally negligible from motor vehicles.
- Sulfur Hexafluoride (SF<sub>6</sub>) is another high GWP gas that is not naturally occurring and are generated in a variety of industrial processes. Emissions of SF<sub>6</sub> are generally negligible from motor vehicles.

For most non-industrial development projects, motor vehicles make up the bulk of GHG emissions, particularly carbon dioxide, methane, nitrous oxide, and HFCs.<sup>24</sup> The other GHGs are less abundant but have higher GWP than CO<sub>2</sub> (refer to Table IV-7). To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO<sub>2</sub>, denoted as CO<sub>2</sub>e. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO<sub>2</sub> were being emitted. High GWP gases such as HFCs, PFCs, and SF<sub>6</sub> are the most heat-absorbent.

**Table IV-7  
Global Warming Potential for Greenhouse Gases**

Greenhouse Gas	Global Warming Potential
Carbon Dioxide (CO <sub>2</sub> )	1
Methane (CH <sub>4</sub> )	28
Nitrous Oxide (N <sub>2</sub> O)	265
Hydrofluorocarbons (HFCs), Perfluorocarbons (PFCs)	7,000 – 11,000
Sulfur Hexafluoride (SF <sub>6</sub> )	23,500

*Source: California Air Resources Board, First Update to the Climate Change Scoping Plan, May 2014.*

<sup>23</sup> United States Environmental Protection Agency, *U.S. Adipic Acid and Nitric Acid N<sub>2</sub>O Emissions 1990-2020: Inventories, Projections and Opportunities for Reductions*, December 2001

<sup>24</sup> California Air Resources Board, *Climate Change Emission Control Regulations, 2004*

The effects of increasing global temperature are difficult to quantify. In general, increases in the ambient global temperature as a result of increased GHGs is anticipated to result in rising sea levels which could threaten coastal areas through accelerated coastal erosion, threats to levees and inland water systems and disruption to coastal wetlands and habitat.

If the temperature of the ocean warms, it is anticipated that the winter snow season would be shortened. Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of supply for the state. This phenomenon could lead to significant challenges securing an adequate water supply for a growing state population. Further, the increased ocean temperature could result in increased moisture flux into the state; however, since this would likely increasingly come in the form of rain rather than snow in the high elevations, increased precipitation could lead to increased potential and severity of flood events, placing more pressure on California's levee/flood control system. If sea level rise occurs, resultant effects could include increased coastal flooding, saltwater intrusion and disruption of wetlands. As the existing climate throughout California changes over time, migration or failure of species to migrate in time to adapt to the perturbations in climate, could also result.

While efforts to reduce the rate of GHG emissions continue, the State has developed a strategy to begin the process of adapting the State's infrastructure to the impacts of climate change. The 2009 California Climate Adaptation Strategy analyzed risks and vulnerabilities and proposes strategies to reduce risks. The Strategy began an ongoing process of adaptation, as directed by Governor Schwarzenegger's Executive Order S-13-08. The Strategy analyzed two components of climate change: (1) projecting the amount of climate change that may occur using computer-based global climate models and (2) assessing the natural or human systems' abilities to cope with and adapt to change by examining past experience with climate variability and extrapolating from this to understand how the systems may respond to the additional impact of climate change. The Strategy's key preliminary adaptation recommendations included the following:

- Appointment of a Climate Adaption Advisory Panel;
- Improved water management in anticipation of reduced water supplies, including a 20 percent reduction in per capita water use by 2020 from 2011 levels;
- Consideration of project alternatives that avoid significant new development in areas that cannot be adequately protected from flooding due to climate change;
- Preparation of agency-specific adaptation plans, guidance or criteria by September 2010;
- Consideration of climate change impacts for all significant State projects;
- Assessment of climate change impacts on emergency preparedness;

- Identification of key habitats and development of plans to minimize adverse effects from climate change;
- Development of guidance by the California Department of Public Health by September 2010 for use by local health departments to assess adaptation strategies;
- Amendment of General Plans and Local Coastal Plans to address climate change impacts and to develop local risk reduction strategies; and
- Inclusion of climate change impact information into fire program planning by State fire fighting agencies.

### *Regulatory Setting*

#### *International*

##### *Kyoto Protocol*

In 1988, the United Nations established the Intergovernmental Panel on Climate Change to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States (the "U.S.") joined other countries around the world in signing the United Nations' Framework Convention on Climate Change (the "UNFCCC") agreement with the goal of controlling greenhouse gas emissions. As a result, the Climate Change Action Plan was developed to address the reduction of GHG emissions in the U.S. The plan currently consists of more than 50 voluntary programs for member nations to adopt.

The Kyoto Protocol (the "Protocol") is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. Some have estimated that if the commitments outlined in the Protocol are met, global GHG emissions could be reduced an estimated five percent from 1990 levels during the first commitment period of 2008-2012. Notably, while the U.S. is a signatory to the Kyoto protocol, Congress has not ratified the Protocol and the U.S. is not bound by the Protocol's commitments. In December 2009, international leaders from 192 nations met in Copenhagen to address the future of international climate change commitments post-Protocol.

The major feature of the Protocol is that it sets binding targets for 37 industrialized countries and the European community for reducing GHG emissions. The targets amount to an average of five percent reduction levels against 1990 levels over the five-year period 2008-2012. The major distinction between the Protocol and the UNFCCC is that while the UNFCCC encouraged industrialized countries to stabilize GHG emissions, the Protocol commits them to do so. Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities."

On December 12, 2015, a Conference of the Parties to the UNFCCC and the 11<sup>th</sup> session of the Kyoto Protocol negotiated an agreement in Paris that would keep the rise of temperature below 2 degrees Celsius. While 186 countries published their action plans detailing how they plan to reduce their GHG emissions, these reductions would still result in up to three degrees Celsius of global warming. The Paris agreement asks all countries to review their plans every five years from 2020, acknowledges that \$100 billion is needed each year to enable countries to adapt to climate change. The agreement was signed into law on April 22, 2016.

#### *The Western Regional Climate Action Initiative (WCI)*

The Western Regional Climate Action Initiative (the "WCI") is a partnership among seven states, including California, and four Canadian provinces to implement a regional, economy-wide cap-and-trade system to reduce global warming pollution. The WCI will cap GHG emissions from the region's electricity, industrial, and transportation sectors with the goal to reduce the heat trapping emissions that cause global warming to 15 percent below 2005 levels by 2020. When the WCI adopted this goal in 2007, it estimated that this would require 2007 levels to be reduced worldwide between 50 percent and 85 percent by 2050. California is working closely with the other states and provinces to design a regional GHG reduction program that includes a cap-and-trade approach. The California Air Resources Board's (CARB) planned cap and-trade program, discussed below, is also intended to link California and the other member states and provinces.

#### *Federal*

The United States Environmental Protection Agency (the "U.S. EPA") has historically not regulated GHGs because it determined the Clean Air Act did not authorize it to regulate emissions that addressed climate change. In 2007, the U.S. Supreme Court found that GHGs could be considered within the Clean Air Act's definition of a pollutant.<sup>25</sup> In December 2009, U.S. EPA issued an endangerment finding for GHGs under the Clean Air Act, setting the stage for future regulation. In September 2009, the National Highway Traffic Safety Administration and U.S. EPA announced a joint rule that would tie fuel economy to GHG emission reduction requirements.

In June 2013, President Obama announced a Climate Action Plan that calls for a number of initiatives, including funding \$8 billion in advanced fossil energy efficiency projects, calls for federal agencies to develop new emission standards for power plants, invests in renewable energy sources, calling for adaptation programs, and leading international efforts to address climate change. In September 2013, U.S. EPA announced its first steps to implement a portion of the Obama Climate Action Plan by proposing carbon pollution standards for new power plants.

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<sup>25</sup> *Massachusetts v. Environmental Protection Agency et al* [127 S. Ct. 1438 (2007)]

### *Vehicle Standards*

Other regulations have been adopted to address vehicle standards including the U.S. EPA and National Highway Traffic Safety Administration (the "NHTSA") joint rulemaking for vehicle standards.

- On March 30, 2009, the NHTSA issued a final rule for model year 2011.<sup>26</sup>
- On May 7, 2010, the U.S. EPA and the NHTSA issued a final rule regulating fuel efficiency and GHG emissions pollution from motor vehicles for cars and light-duty trucks for model years 2012–2016.<sup>27</sup>
- On August 9, 2011, U.S. EPA and NHTSA issued a Supplemental Notice of Intent announcing plans to propose stringent, coordinated federal GHG emissions and fuel economy standards for model year 2017–2025 light-duty vehicles.<sup>28</sup>
- NHTSA intends to set standards for model years 2022–2025 in a future rulemaking.<sup>29</sup>
- In addition to the regulations applicable to cars and light-duty trucks, on August 9, 2011, the U.S. EPA and the NHTSA announced fuel economy and GHG emissions standards for medium- and heavy-duty trucks that applies to vehicles from model year 2014–2018.<sup>30</sup>

### *Energy Independence and Security Act (the "EISA")*

Among other key measures, the EISA would do the following, which would aid in the reduction of national GHG emissions, both mobile and non-mobile:

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<sup>26</sup> NHTSA. 2009. *Average Fuel Economy Standards Passenger Cars and Light Trucks Model Year 2011, Final Rule*. 75 Fed. Reg. 25324.

<sup>27</sup> U.S. EPA. 2010. *Light Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, Final Rule*. 75 Fed. Reg. 25324.

<sup>28</sup> Available: <http://www.gpo.gov/fdsys/pkg/FR-2011-08-09/pdf/2011-19905.pdf>. Accessed May 2014

<sup>29</sup> NHTSA. 2012. *2017 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions and Corporate Average Fuel Economy Standards*. 77 Fed. Reg. 62624.

<sup>30</sup> U.S. EPA Office of Transportation and Air Quality. 2011. *EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles*. Available: <http://www.epa.gov/otaq/climate/documents/420f11031.pdf>. Accessed May 2014.

- 1) Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- 2) Prescribe or revise standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.
- 3) While superseded by NHTSA and U.S. EPA actions described above, EISA also set miles per gallon targets for cars and light trucks and directed the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.

Additional provisions of the EISA address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."

#### State

##### *Assembly Bill 1493*

California has adopted a series of laws and programs to reduce emissions of GHGs into the atmosphere. Assembly Bill (AB) 1493 was enacted in September 2003 and requires regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by vehicles used for personal transportation. The Team reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in the Executive Order.<sup>31</sup> Furthermore, the report provided to Governor Schwarzenegger in 2006, referenced above, indicated that smart land use and increased transit availability should be a priority in the State of California.<sup>32</sup> According to the California Climate Action Team, smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population.

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<sup>31</sup> California Climate Action Team, *Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006*.

<sup>32</sup> California Climate Action Team, *Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 57*.



*Executive Order B-30-15*

On April 29, 2015, Governor Brown issued an executive order setting a Statewide GHG reduction target of 40 percent below 1990 levels by 2030. This action aligns the State's GHG targets with those set in October 2014 by the European Union and is intended to help the State meet its target of reducing GHG emissions 80 percent below 1990 levels by 2050. The measure calls on State agencies to implement measures accordingly and directs CARB to update the Climate Change Scoping Plan.

A recent study shows that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030 (consistent with Executive Order B-30-15), and to 60 percent below 1990 levels by 2050. Even though this study did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, it demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the study could allow the State to meet the 2030 and 2050 targets.<sup>33</sup>

*Executive Order S-3-05*

On June 1, 2005, Governor Schwarzenegger issued Executive Order S-3-05, which set the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. The California Environmental Protection Agency (Cal EPA) formed a Climate Action Team ("CAT") that recommended strategies that can be implemented by state agencies to meet GHG emissions targets. The Team reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in the Executive Order.<sup>34</sup> Furthermore, the report provided to Governor Schwarzenegger in 2006, referenced above, indicated that smart land use and increased transit availability should be a priority in the State of California.<sup>35</sup> According to the California Climate Action Team, smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies

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<sup>33</sup> Greenblatt, Jeffrey. *Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions"* (Vol. 78, pp. 158-172).

<sup>34</sup> *California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006.*

<sup>35</sup> *California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 57.*

develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population.

#### *Assembly Bill 32*

In September 2006, AB 32 was signed into law by Governor Arnold Schwarzenegger, focusing on achieving GHG emissions equivalent to statewide levels in 1990 by 2020. It mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. A companion bill, Senate Bill (SB) 1368, requires the California Public Utilities Commission and the California Energy Commission to establish GHG emission performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the state.

AB 32 charges CARB with the responsibility to monitor and regulate sources of GHG emissions. On June 1, 2007, CARB adopted three early action measures: setting a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance, and increasing methane capture from landfills.<sup>36</sup> On October 25, 2007, CARB approved measures improving truck efficiency (i.e., reducing aerodynamic drag), electrifying port equipment, reducing PFCs from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing sulfur hexafluoride emissions from the non-electricity sector. CARB determined that the total statewide aggregated GHG 1990 emissions level and 2020 emissions limit is 427 million metric tons of CO<sub>2</sub>e. The 2020 target reductions are currently estimated to be 174 million metric tons of CO<sub>2</sub>e.

CARB developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap. This Scoping Plan, which was developed by CARB in coordination with the Climate Action Team, was first published in October 2008 (the "2008 Scoping Plan"). The 2008 Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the state's dependence on oil, diversify the state's energy sources, save energy, create new jobs, and enhance public health. An important component of the plan is a cap-and-trade program covering 85 percent of the state's emissions. Additional key recommendations of the 2008 Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California's clean cars standards and increasing the amount of clean and renewable energy used to power the state. Furthermore, the 2008 Scoping Plan proposes full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in California ports. As required by AB 32, CARB must update its Scoping Plan every five years to ensure that California remains on the path toward a low carbon future.

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<sup>36</sup> California Air Resources Board, *Proposed Early Action Measures to Mitigate Climate Change in California*, April 20, 2007.

In order to assess the scope of reductions needed to return to 1990 emissions levels, CARB first estimated the 2020 business-as-usual (BAU) GHG emissions in the 2008 Scoping Plan. These are the GHG emissions that would be expected to result if there were no GHG emissions reduction measures, and as if the state were to proceed on its pre-AB 32 GHG emissions track. After estimating that statewide 2020 BAU GHG emissions would be 596 metric tons, the 2008 Scoping Plan then identified recommended GHG emissions reduction measures that would reduce BAU GHG emissions by approximately 174 metric tons (an approximately 28.35 percent reduction) by 2020.

On May 22, 2014, CARB approved its first update to the AB 32 Scoping Plan, recalculating 1990 GHG emissions using IPCC Fourth Assessment Report (AR4) released in 2007. It states that based on the AR4 global warming potentials, the 427 MMTCO<sub>2</sub>e 1990 emissions level and 2020 GHG emissions limit would be slightly higher than identified in the Scoping Plan, at 431 MMTCO<sub>2</sub>e. Based on the revised estimates of expected 2020 emissions identified in the 2011 supplement to the FED and updated 1990 emissions levels identified in the draft first update to the Scoping Plan, achieving the 1990 emission level would require a reduction of 76 MMTCO<sub>2</sub>e (down from 507 MMTCO<sub>2</sub>e) or a reduction by approximately 15.3 percent (down from 28.4 percent) to achieve in 2020 emissions levels in the BAU condition.

CARB's First Update "lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," and many of the emission reduction strategies recommended by CARB would serve to reduce the Project's post-2020 emissions level to the extent applicable by law by focusing on reductions from several sectors.<sup>37,38</sup>

As shown on Table IV-8, these reductions are to come from a variety of sectors, including energy, transportation, high-global warming potential sources, waste, and the State's cap-and-trade emissions program.

Nearly all reductions are to come from sources that are controlled at the statewide level by State agencies, including the Air Resources Board, Public Utilities Commission, High Speed Rail Authority, and California Energy Commission. The few actions that are directly or indirectly associated with local government control are in the Transportation sector, which is charged with reducing 4.5 percent of baseline 2020 emissions. Of these actions, only one (GHG reductions through coordinated planning) specifically identifies local governments as the responsible agency.

<sup>37</sup> CARB, *First Update*, p. 4, May 2014. See also *id.* at pp. 32-33 [recent studies show that achieving the 2050 goal will require that the "electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles."]

<sup>38</sup> CARB, *First Update*, Table 6: *Summary of Recommended Actions by Sector*, pp. 94-99, May 2014.

### Cap And Trade

CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from major sources (deemed “covered entities”) by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32’s emission-reduction mandate of returning to 1990 levels of emissions by 2020. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the program’s duration.

**Table IV-8  
Emissions Reductions Needed to Meet AB 32 Objectives in 2020**

Sector	Million Metric Tons of CO <sub>2</sub> e Reduction	Percent of Statewide CO <sub>2</sub> e Inventory	Summary of Recommended Actions
Energy	-25	-4.9%	Reduce State’s electric and energy utility emissions, reduce emissions from large industrial facilities, control fugitive emissions from oil and gas production, reduce leaks from industrial facilities
Transportation	-23	-4.5%	Phase 2 heavy-duty truck GHG standards, ZEV action plan for trucks, construct High Speed rail system from SF to LA, coordinated land use planning, Sustainable Freight Strategy
High Global Warming Potential	-5	-1.0%	Reduce use of high-GWP compounds from refrigeration, air conditioning, aerosols
Waste	-2	-0.4%	Eliminate disposal of organic materials at landfills, in-State infrastructure development, address challenges with composting and anaerobic digestion, additional methane control and landfills
Cap and Trade Reductions	-23	-4.5%	Statewide program that reduces emissions from regulated entities through performance-based targets
<b>Total</b>	<b>-78</b>	<b>-15.3%</b>	

Source: California Environmental Protection Agency. “First Update to the Climate Change Scoping Plan.” May 2014.

Under the Cap-and-Trade Program, covered entities that emit more than 25,000 metric tons CO<sub>2</sub>e per year must comply with the Cap-and-Trade Program. Triggering of the 25,000 metric tons CO<sub>2</sub>e per year “inclusion threshold” is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions. CARB issues allowances equal

to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits.

The Cap-and-Trade Program works with other direct regulatory measures and provides an economic incentive to reduce emissions. If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. Thus, the Cap-and-Trade Program assures that California will meet its 2020 GHG emissions reduction mandate.

In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by CARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures.

As of January 1, 2015, the Cap-and-Trade Program covered approximately 85 percent of California's GHG emissions. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program.

While the 2020 cap would remain in effect post-2020,<sup>39</sup> the Cap-and-Trade Program is not currently scheduled to extend beyond 2020 in terms of additional GHG emissions reductions.<sup>40</sup> However, CARB has expressed its intention to extend the Cap-and-Trade Program beyond 2020 in conjunction with setting a mid-term target. The "recommended action" in the First Update for the Cap-and-Trade Program is: "Develop a plan for a post-2020 Cap-and-Trade Program, including cost containment, to provide market certainty and address a mid-term emissions target."<sup>41</sup> The "expected completion date" for this recommended action is 2017.<sup>42</sup> It is therefore reasonable to assume that the Cap-and-Trade Program will extend beyond 2020.

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<sup>39</sup> *California Health & Safety Code § 38551(a)* ("The statewide greenhouse gas emissions limit shall remain in effect unless otherwise amended or repealed.")

<sup>40</sup> *See AB 1288 (Atkins, introduced 2015) that would eliminate the December 31, 2020, limit on the Cap-and-Trade Program.*

<sup>41</sup> *CARB, First Update to the Climate Change Scoping Plan: Building on the Framework*, at 98 (May 2014).

<sup>42</sup> *Ibid.*

*State Bill 1368*

Senate Bill (SB) 1368, requires the California Public Utilities Commission and the California Energy Commission to establish GHG emissions performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the state.

*State Bill 97 and CEQA Guidelines*

In August 2007, the California State Legislature adopted Senate Bill 97 (SB 97), requiring the Governor's Office of Planning and Research (OPR) to prepare and transmit new CEQA guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. In response to SB 97, the Governor's Office of Planning and Research (OPR) adopted CEQA guidelines that became effective on March 18, 2010. The amendments provide guidance to public agencies on analysis and mitigation of the effects of GHG emissions in CEQA documents, including the following:

- Lead agencies should quantify all relevant GHG emissions and consider the full range of project features that may increase or decrease GHG emissions as compared to the existing setting;
- Consistency with the CARB Scoping Plan is not a sufficient basis to determine that a project's GHG emissions would not be cumulatively considerable;
- A lead agency may appropriately look to thresholds developed by other public agencies, including the CARB's recommended CEQA thresholds;
- To qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project. General compliance with a plan, by itself, is not mitigation;
- The effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis; and
- Given that impacts resulting from GHG emissions are cumulative, significant advantages may result from analyzing such impacts on a programmatic level. If analyzed properly, later projects may tier, incorporate by reference, or otherwise rely on the programmatic analysis.

*State Bill 375*

On September 30, 2008, SB 375 was instituted to help achieve AB 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires MPOs to prepare a

Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. While SB 375 does not prevent CARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.

On October 24, 2008, CARB published draft guidance for setting interim GHG significance thresholds. This was the first step toward developing the recommended statewide interim thresholds of significance for GHG emissions that may be adopted by local agencies for their own use. The guidance does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that are responsible for substantial GHG emissions (i.e., industrial, residential, and commercial projects). CARB believes that thresholds in these sectors will advance climate objectives, streamline project review, and encourage in CEQA analyses of GHG emissions throughout the State.

On September 23, 2010, CARB adopted regional targets for the reduction of GHG emissions applying to the years 2020 and 2035.<sup>43</sup> For the area under the Southern California Association of Governments' (SCAG) jurisdiction—including the Project area—CARB adopted Regional Targets for reduction of GHG emissions by 8 percent for 2020 and by 13 percent for 2035. On February 15, 2011, the CARB's Executive Officer approved the final targets.<sup>44</sup>

#### *Title 24 Energy Efficiency Standards*

California's Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

#### *California Green Building Standards*

The California Green Building Standards Code, which is Part 11 of the California Code of Regulations (the "CCR"), is commonly referred to as the CALGreen Code. The 2008 edition, the first edition of the CALGreen Code, contained only voluntary standards. The 2010 CALGreen Code is a code with mandatory requirements for state-regulated buildings and structures throughout California beginning on

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<sup>43</sup> California Air Resources Board. *Notice of Decision: Regional Greenhouse Gas Emissions Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375*. <http://www.arb.ca.gov/cc/sb375/notice%20of%20decision.pdf>

<sup>44</sup> CARB. 2011. *Executive Order No. G-11-024: Relating to Adoption of Regional Greenhouse Gas Emission Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375*.

January 1, 2011. The 2010 CALGreen Code contains requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation and more. The CALGreen Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The CALGreen Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems are functioning at their maximum efficiency. The current 2013 CALGreen Code became effective January 1, 2014 and includes new requirements for additions to existing residential and non-residential development. The upcoming 2016 CALGreen Code standard will become effective January 1, 2017.

### Regional

#### *SCAQMD Recommendations for Significance Thresholds*

The SCAQMD convened a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members of the working group include government agencies implementing CEQA and representatives from stakeholder groups that will provide input to the SCAQMD staff on developing GHG CEQA significance thresholds. On December 5, 2008, the SCAQMD Governing Board adopted interim GHG significance threshold for projects where the SCAQMD is lead agency. This threshold uses a tiered approach to determine a project's significance, with 10,000 metric tons of CO<sub>2</sub> equivalent (MTCO<sub>2e</sub>) as a screening numerical threshold for stationary sources.

The SCAQMD has not adopted guidance for CEQA projects under other lead agencies. In September 2010, the Working Group released additional revisions which recommended a screening threshold of 3,500 MTCO<sub>2e</sub> for residential projects, 1,400 MTCO<sub>2e</sub> for commercial projects, and 3,000 MTCO<sub>2e</sub> for mixed use projects, additionally the Working Group identified project-level efficiency target of 4.8 MTCO<sub>2e</sub> per service population as a 2020 target and 3.0 MTCO<sub>2e</sub> per service population as a 2035 target. The recommended area wide or plan-level target for 2020 was 6.6 MTCO<sub>2e</sub> and the plan-level target for 2035 was 4.1 MTCO<sub>2e</sub>. The SCAQMD has not established a timeline for formal consideration of these thresholds.<sup>45</sup> In the meantime, the project level thresholds are used as a non-binding guide.

The SCAQMD has also adopted Rules 2700, 2701, and 2702 that address GHG emissions reductions. However, these rules address boilers and process heaters, forestry, and manure management projects, none of which are proposed or required of the Project.

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<sup>45</sup> SCAG, *Final PEIR for the 2012-2035 RTP/SCS, Appendix G*. Accessible at [http://rtpscs.scag.ca.gov/Documents/peir/2012/PEIR\\_AppendixG\\_ExampleMeasures.pdf](http://rtpscs.scag.ca.gov/Documents/peir/2012/PEIR_AppendixG_ExampleMeasures.pdf)



### *SCAG 2016-2040 RTP/SCS*

On April 6, 2016, SCAG adopted its 2016-2040 RTP/SCS update, calling for a continuation of integrated planning for land use and transportation that will help achieve the State's goal of reducing per capita GHG emissions by eight percent by 2020 compared to 2005 levels, by 18 percent by 2035, and 21 percent by 2040. The Plan calls for public transportation improvements that will reduce GHG emissions per household by up to 30 percent, one percent reduction in GHG emissions from having zero emission vehicles, neighborhood vehicles, and car-sharing/ride-sourcing make up two percent of the vehicle fleet by 2040. However, until the 2016-2040 RTP/SCS is incorporated into the region's federally-approved AQMP, the 2012-2035 RTP/SCS is the relevant transportation plan for air quality regulatory purposes.

### *Local*

The City has adopted its LA Green Plan that outlines goals and actions to reduce the generation of GHG emissions to 35 percent below 1990 levels. Key strategies include increasing the generation of renewable energy, improving energy conservation and efficiency, and changing land use patterns to reduce dependence on autos.

The City adopted a Green Building Ordinance in April 2008 that calls for reduction of the use of natural resources for new development. Larger projects must be certified by the Leadership in Energy and Environmental Design (LEED), including the following:

- New non-residential building or structure of 50,000 gross square feet or more of floor area;
- New mixed-use or residential building of 50,000 gross square feet or more in excess of six stories;
- New mixed-use or residential building of six or fewer stories consisting of at least 50 dwelling units in a building, which has at least 50,000 gross square feet of floor area, and in which at least 80 percent of the building's floor area is dedicated to residential units;
- The alteration or rehabilitation of 50,000 gross square feet or more of floor area in an existing non-residential building for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building;
- The alteration of at least 50 dwelling units in an existing mixed-use or residential building, which has at least 50,000 gross square feet of floor area, for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building.

The City's Green Building Ordinance has several requirements that call for reductions in GHG emissions from reducing in energy use, water use, and solid waste generation, including the following:

*Section 99.04.204. Energy Reduction.* Equipment and fixtures shall comply with the following where applicable:

1. Installed gas-fired space heating equipment shall have an Annual Fuel Utilization Ratio (AFUE) of .90 or higher.
2. Installed electric heat pumps shall have a Heating Seasonal Performance Factor (HSPF) of 8.0 or higher.
3. Installed cooling equipment shall have a Seasonal Energy Efficiency Ratio (SEER) higher than 13.0 and an Energy Efficiency Ratio (EER) of at least 11.5.
4. Installed tank type water heaters shall have an Energy Factor (EF) higher than .6.
5. Installed tankless water heaters shall have an Energy Factor (EF) higher than .80.
6. Perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow.
7. Building lighting in the kitchen and bathrooms within the dwelling units shall consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaires).
8. Installed swimming pool circulating pump motors shall be multi-speed or variable-speed. The pump motor controls shall have the capability of operating the pump at a minimum of three speeds; low speed, medium speed, and high speed. The daily low speed shall not exceed 300 watts. The daily medium speed shall be adjustable.

*Section 99.04.210. Appliances. Appliance Rating.* Each appliance provided and installed shall meet ENERGY STAR if an ENERGY STAR designation is applicable for that appliance.

*Section 99.04.211. Renewable Energy. Future Access for Electrical Solar System.* An electrical conduit shall be provided from the electrical service equipment to an accessible location in the attic or other location suitable for future connection to a solar system. The conduit shall be adequately sized by the designer but shall not be less than one inch. The conduit shall be labeled as per the Los Angeles Fire Department requirements. The electrical panel shall be sized to accommodate the installation of a future electrical solar system. Exception: Buildings designed and constructed with a solar photovoltaic system or an alternate system with means of generating electricity at time of final inspection.

*Section 99.04.211.4.1. Space for Future Electrical Solar System Installation.* A minimum of 250 square feet of contiguous unobstructed roof area shall be provided for the installation of future photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.

*Section 99.04.303.1. Twenty Percent Savings.* A schedule of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the building by at least 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture and fitting as required by the California Building Standards Code. The 20 percent reduction in potable water use shall be demonstrated by one of the following methods:

1. Each plumbing fixture and fitting shall meet reduced flow rates specified on Table 4.303.2; or
2. A calculation demonstrating a 20 percent reduction in the building "water use" baseline as established on Table 4.303.1 shall be provided. For low-rise residential occupancies, the calculation shall be limited to the following plumbing fixture and fitting types: water closets, urinals, lavatory faucets, kitchen faucets and showerheads.

*Section 99.04.303.2. Multiple Showerheads Serving One Shower.* When single shower fixtures are served by more than one showerhead, the combined flow rate of all the showerheads shall not exceed the maximum flow rates specified in the 20 percent reduction column contained on Table 4.303.2 or the shower shall be designed to only allow one showerhead to be in operation at a time. Exception: The maximum flow rate for showerheads when using the calculation method specified in Section 99.04.303.1, Item 2, is 2.5 gpm @ 80 psi.

*Section 99.04.304.1. Irrigation Controllers.* When automatic irrigation system controllers for landscaping are provided and installed at the time of final inspection, the controllers shall comply with the following:

1. Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change;
2. Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor that connects or communicates with the controller(s). Soil moisture-based controllers are not required to have rain sensor input. Buildings on sites with over 2,500 square feet of cumulative irrigated landscaped areas shall have irrigation controllers that meet the criteria in Section 99.04.304.1.

*Section 99.04.406. Enhanced Durability and Reduced Maintenance. Joints and Openings.* Openings in the building envelope separating conditioned space from unconditioned space needed to accommodate gas, plumbing, electrical lines and other necessary penetrations must be sealed in compliance with the California Energy Code.

*Section 99.05.407.3. Water Resistance and Moisture Management. Flashing Details.* Provide flashing details on the building plans which comply with accepted industry standards or manufacturer's instructions around windows and doors, roof valley, and chimneys to roof intersections.

*Section 99.04.407.4. Material Protection.* Protect building materials delivered to the construction site from rain and other sources of moisture.

*Section 99.04.408. Construction Waste Reduction, Disposal And Recycling. Construction Waste Reduction of at Least 50 Percent.* Comply with Section 66.32 et seq. of the LAMC.

#### *Mobility Plan 2035*

On January 20, 2016, the City of Los Angeles adopted its Mobility Plan 2035, a transportation element of its General Plan. The Plan calls for strategies that advance five goals: 1) Safety First, 2) World Class Infrastructure, 3) Access for All Angelenos, 4) Collaboration, Communication, and Informed Choices, and 5) Clean Environments and Healthy Communities.

While the Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation and targeting GHG emissions through a more sustainable transportation system. As such, the Plan's call for integrated land use planning, clean fuel vehicles are consistent with State and regional plans calling for more compact growth in areas with transportation infrastructure.

#### *Methodology*

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

The California Climate Action Registry (Climate Registry) General Reporting Protocol provides basic procedures and guidelines for calculating and reporting GHG emissions from a number of general and industry-specific activities.<sup>46</sup> The General Reporting Protocol is based on the "Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard" developed by the World Business Council for

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<sup>46</sup> *California Climate Action Registry, General Reporting Protocol Version 3.1, January 2009, [www.sfeenvironment.org/sites/default/files/fliers/files/c-car\\_grp\\_3-1\\_january2009\\_sfe-web.pdf](http://www.sfeenvironment.org/sites/default/files/fliers/files/c-car_grp_3-1_january2009_sfe-web.pdf), accessed August 1, 2016.*

Sustainable Development and the World Resources Institute through “a multi-stakeholder effort to develop a standardized approach to the voluntary reporting of GHG emissions.”<sup>47</sup> The General Reporting Protocol provides a basic framework for calculating and reporting GHG emissions from the project. The information provided in this analysis is consistent with the General Reporting Protocol’s reporting requirements.

The General Reporting Protocol recommends the separation of GHG emissions into three categories that reflect different aspects of ownership or control over emissions. They include the following:

- Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).
- Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.
- Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy (e.g., energy used to convey, treat, and distribute water and wastewater).<sup>48</sup>

The General Reporting Protocol provides a range of basic calculations methods. However, the General Reporting Protocol calculations are typically designed for existing buildings or facilities. These retrospective calculation methods are not directly applicable to planning and development situations where buildings do not yet exist.

CARB recommends consideration of indirect emissions to provide a more complete picture of the GHG footprint of a facility. Annually reported indirect energy usage aids the conservation awareness of a facility and provides information to CARB to be considered for future strategies.<sup>49</sup> For example, CARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, the Office of Planning and Research has noted that lead agencies “should make a good-faith effort, based on available information, to calculate, model, or estimate... GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption,

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<sup>47</sup> *Ibid.*

<sup>48</sup> *Embodied energy is a scientific term that refers to the quantity of energy required to manufacture and supply to the point of use a product, material, or service.*

<sup>49</sup> *California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), Planning and Technical Support Division Emission Inventory Branch, October 19, 2007, www.urb.ca.gov/regact/2007/ghg2007/isor.pdf, accessed August 1, 2016.*

water usage and construction activities.<sup>50</sup> Therefore, direct and indirect emissions have been calculated for the Project.

GHG emissions were quantified from construction and operation of the Project using SCAQMD's California Emissions Estimator Model (CalEEMod). Operational emissions include both direct and indirect sources including mobile sources, water use, solid waste, area sources, natural gas, and electricity use emissions. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.<sup>51</sup>

### *Thresholds of Significance*

CARB, SCAQMD and the City of Los Angeles have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the Project.<sup>52</sup> As a result, this analysis relies on primary direction from the CEQA Guidelines. OPR's amendments to the CEQA Guidelines for GHGs were adopted by the Resources Agency on December 30, 2009, indicating that a project could have a significant impact if it would:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.<sup>53</sup>

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<sup>50</sup> OPR Technical Advisory, p. 5.

<sup>51</sup> See [www.caleemod.com](http://www.caleemod.com).

<sup>52</sup> The South Coast Air Quality Management District formed a GHG Significance Threshold Working Group. Information on this Working Group is available at [www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2).

<sup>53</sup> A recent opinion by the California Supreme Court on November 30, 2015 (*Center for Biological Diversity v. California Department of Fish and Wildlife*) has suggested that environmental analyses need to support its assumptions and provide evidentiary support to find consistency with a "Business as Usual" approach with the AB 32 Scoping Plan.

Section 15064.4 of the CEQA Guidelines was adopted to assist lead agencies in determining the significance of the impacts of GHGs. It urges the quantification of GHG emissions where possible and includes language necessary to avoid an implication that a “life-cycle” analysis is required. It also recommends considering other qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs). Further, it states that:

1. A lead agency should consider the following factors, among others, when assessing the significance of greenhouse gas emissions on the environment:
  - a. The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
  - b. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
  - c. The extent to which the project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project’s incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

Lead agencies are to establish thresholds in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as CAPCOA, so long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative. The CEQA Guidelines were amended in response to Senate Bill 97 to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.<sup>54</sup> Examples of such programs include a “water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the

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<sup>54</sup> *Id.*

reduction of greenhouse gas emissions.<sup>55</sup> Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with the California Cap-and-Trade Program and/or other regulatory schemes to reduce GHG emissions.<sup>56</sup>

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.<sup>57</sup>

To evaluate a project's potential greenhouse gas emissions under CEQA, a lead agency may adopt a significance criterion of whether the project will be consistent with statewide greenhouse gas emission reduction goals, as set forth in the California Global Warming Solutions Act of 2006 (or "AB 32") and the California Air Resources Board 2008 Climate Change Scoping Plan ("Scoping Plan") that implements A.B. 32. (*Center for Biological Diversity v. Cal. Dept. of Fish and Game* (2015) 62 Cal.4th 204, 220; see also CEQA Guidelines § 15064.4.)

The statewide greenhouse gas reduction goals include cutting greenhouse gas emissions by approximately 30 percent from the BAU emission levels projected for 2020. The Scoping Plan sets forth the BAU projection, which assumes no conservation or regulatory efforts beyond what was in place when the

<sup>55</sup> *Id.* (emphasis added).

<sup>56</sup> See *San Joaquin Valley Air Pollution Control District, CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR—2030* (June 25, 2014), where the SJVAPCD "determined that GHG emissions increases that are covered under ARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA..." Further, SCAQMD has taken this position as a lead agency, preparing three Negative Declarations and one Draft EIR that applied its 10,000 MTCO<sub>2</sub>/yr. significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See SCAQMD, *Final Negative Declaration for Ultramar Inc. Wilmington Refinery Cogeneration Project*, SC# 2012041014 ([www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/ultramar\\_neg\\_dec.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/ultramar_neg_dec.pdf?sfvrsn=2)) (October 2014); SCAQMD, *Final Negative Declaration for Phillips 66 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project*, SC# No. 2013091029 (December 2014) ([www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/phillips-66-fnd.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/phillips-66-fnd.pdf?sfvrsn=2)); *Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA*, SC# No. 2014101040 ([www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/exide-mnd\\_final.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/exide-mnd_final.pdf?sfvrsn=2)) (December 2014); and *Draft Environmental Impact Report for the Breithurn Santa Fe Springs Blocks 400/700 Upgrade Project*, SC# No. 2014121014 ([www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2015/deir-breithurn-chapters-1-3.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2015/deir-breithurn-chapters-1-3.pdf?sfvrsn=2)) (April 2014).

<sup>57</sup> 14 C.C.R. § 15064(h)(3).



forecast was made. A lead agency may use the BAU projection as the baseline to compare a project's expected greenhouse gas emissions rather than using a baseline of emissions in the existing physical environment. However, the lead agency must provide substantial evidence to show that a project's specific *project-level* reduction in greenhouse gas emissions as compared to the BAU projection will actually meet the *statewide* goals of greenhouse gas reductions.

There are three ways a lead agency could make that showing. First, a lead agency may evaluate the data behind the Scoping Plan's BAU model to determine how a specific project in a proposed location would contribute to the statewide greenhouse gas reduction goals. Second, a lead agency may assess a project's consistency with AB 32's goals in whole or in part by considering a project's compliance with regulatory programs designed to reduce greenhouse gas emissions from particular activities, such as building efficiency and conservation standards. Third, a lead agency may rely on existing numerical thresholds of significance for greenhouse gas emissions reductions.

Thus, in the absence of any adopted, quantitative threshold, the Project would not have a significant effect on the environment if it is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions:

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

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

### **Project Impacts**

Construction of the Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project site. These emissions would vary day to day over the 26-month duration of construction activities. As illustrated on Table IV-9, construction emissions of CO<sub>2</sub> would peak in 2018, when up to 28,686 pounds of CO<sub>2</sub>e per day are anticipated (with implementation of Mitigation Measures 3-1 through 3-5).

**Table IV-9**  
**Estimated Construction Emissions (Pounds Per Day)**

Construction Year	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
2017	24,419	5	0	24,520
2018	28,563	6	0	28,686
2019	3,272	<1	0	3,281
2020	3,240	<1	0	3,249

*Source: DKA Planning 2015, based on CalEEMod 2013.2.2*

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

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

The analysis in this section includes potential emissions under NAT scenarios and from the Project at build-out based on actions and mandates expected to be in force in 2020. Early-action measures identified in the *Climate Change Scoping Plan* that have not been approved were not credited in this analysis. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at build-out.

The NAT scenario is used to establish a comparison with project-generated GHG emissions. The NAT scenario does not consider site-specific conditions, project design features, or prescribed mitigation measures. As an example, a NAT scenario would apply a base ITE trip-generation rate for a project and would not consider site-specific benefits resulting from the proposed residential uses or close proximity to public transportation, such as the Metro 256 and DASH El Sereno/City of Torrance. The analysis below establishes NAT as complying with the minimum performance level required under Title 24. The NAT scenario also considers State mandates that were already in place when CARB prepared the *Supplemental FED* (e.g., Pavley 1 Standards, full implementation of California's Statewide Renewables Portfolio Standard beyond current levels of renewable energy, and the California Low Carbon Fuel Standard).

Emissions calculations for the Project include credits or reductions for the regulatory compliance measures and project design features set forth throughout this analysis, such as reductions in energy or water demand. In addition, as mobile source GHG emissions are directly dependent on the number of vehicle trips, a decrease in the number of Project generated trips as a result of project features will provide a proportional reduction in mobile source GHG emissions. This scenario conservatively did not include actions and mandates that are not already in place but are expected to be in force in 2020 (e.g., Pavley II), which could further reduce GHG emissions from use of light-duty vehicles by 2.5 percent.

As shown on Table IV-10, the emissions for the Project and its associated CARB 2020 NAT scenario are estimated to be 937 and 1,357 MTCO<sub>2</sub>e per year, respectively, which shows the Project would reduce emissions by 31 percent from the CARB 2020 NAT scenario. Based on these results, the Project exceeds the reduction target as a numeric threshold of 15.3 percent set forth in the 2014 Revised AB 32 Scoping Plan.

**Table IV-10**  
**Estimated Project Annual CO<sub>2</sub>e GHG Emissions (Metric Tons per Year)**

Scenario and Source	Business As Usual Scenario*	As Proposed Scenario	Reduction from Business As Usual Scenario	Change from Business as Usual Scenario
Area Sources	11	11	-	0%
Energy Sources	408	237	-171	-42%
Mobile Sources	834	585	-248	-30%
Waste Sources	22	22	-	0%
Water Sources	34	34	-	0%
Construction	30	30	-	0%
<b>Total Emissions</b>	<b>1,338</b>	<b>919</b>	<b>-420</b>	<b>-31%</b>

*Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period. To ensure a conservative estimate, emissions from existing development were not included in the calculation of net emissions increases.*

*\* BAU scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State's renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%)*

*Source: DKA Planning, 2016.*

The analysis in this document uses the 2014 Revised AB 32 Scoping Plan's statewide goals as one approach to assess the efficacy of the Project's GHG reduction features and characteristics, as well as the

Project's consistency with statewide and regional GHG reduction plans. . The report's methodology is to compare the Project's emissions as proposed to the Project's emissions if the Project were built using a NAT approach in terms of design, methodology, and technology. This means the Project's emissions were calculated as if it was constructed with project design features to reduce GHG and with several regulatory measures adopted in furtherance of AB 32.

While the AB 32 Scoping Plan's cumulative statewide objectives were not intended to serve as the basis for project-level assessments, this analysis finds that its NAT comparison based on the Scoping Plan is appropriate because the Proposed Project would contribute to statewide GHG reduction goals. Specifically, the Proposed Project's location in an existing urban setting provide opportunities to reduce transportation-related emissions.

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

**Stationary and area sources.** Emissions from small on-site sources are subject to specific emission reduction mandates and/or are included in the State's Cap and Trade program.

**Transportation.** Both construction and operational activities from the Project Site would generate transportation-related emissions from combustion of fossil fuels that are covered in the State's Cap and Trade program.

**Energy Use.** Both construction and operational activities from the Project Site would generate energy-related emissions that are covered by the State's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers from renewable energy sources by December 31, 2030.

**Building structures.** Operational efficiencies will be built into the project that reduce energy use and waste, as mandated by CALGreen building codes.

**Water and wastewater use.** The Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions.

**Major appliances.** The Project would include major appliances that are regulated by California Energy Commission requirements for energy efficiency.

**Solid waste management.** The Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

In addition to the GHG emission reductions described above, it is important to note that the CO<sub>2</sub> estimates from mobile sources (particularly CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing conditions. This is a

standard approach taken for air quality analyses. In many cases, such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the air basin and are in effect new emissions sources, or whether they are sources that were already in the air basin and just shifted to a new location. Because the effects of GHGs are global, a project that shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels.

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

As described throughout this analysis, the Project contains numerous regulatory compliance measures and project design features that would reduce the Project's GHG emissions profile and would represent improvements vis-à-vis the NAT scenario. Also, the Project would not exceed the SCAQMD's proposed (but not adopted) threshold of significance of 3,000 metric tons per year of GHG emissions for residential projects. As a result of this and the analysis of net emissions, the Project's contribution to global climate change is not "cumulatively considerable" and is considered less than significant.

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

**Less Than Significant Impact.** As noted earlier, the Project would be consistent with a number of relevant plans and policies that govern climate change.

- Executive Orders S-3-05 and B-30-15;
- AB 32 Scoping Plan;
- SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy;
- City of Los Angeles Mobility 2035 Plan;
- City of Los Angeles ClimateLA implementation plan; and
- City of Los Angeles Green Building Ordinance

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

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

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

Many of the emission reduction strategies recommended by CARB would serve to reduce the Project's post-2020 emissions level to the extent applicable by law and help lay the foundation "...for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," as called for in CARB's First Update to the AB 32 Scoping Plan.<sup>48, 49</sup>

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

### Consistency with the AB 32 Scoping Plan

The AB 32 Scoping Plan provides the basis for policies that will reduce cumulative GHG emissions within California to 1990 levels by 2020. As a result, the Proposed Project is judged against its consistency with the AB 32 Scoping Plan to determine whether it will result in adverse cumulative impacts to global climate change. The Proposed Project is consistent with the AB 32 Scoping Plan's focus on emission reductions from several key sectors:

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<sup>48</sup> CARB, *First Update*, p. 4, May 2014. See also *id.* at pp. 32-33 [recent studies show that achieving the 2050 goal will require that the "electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles."]

<sup>49</sup> CARB, *First Update*, Table 6: *Summary of Recommended Actions by Sector*, pp. 94-99, May 2014

- **Energy Sector:** Continued improvements in California’s appliance and building energy efficiency programs and initiatives, such as the State’s zero net energy building goals, would serve to reduce the Project’s emissions level.<sup>60</sup> Additionally, further additions to California’s renewable resource portfolio would favorably influence the Project’s emissions level.<sup>61</sup>
- **Transportation Sector:** Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce the Project’s emissions level.<sup>62</sup>
- **Water Sector:** The Project’s emissions level will be reduced as a result of further desired enhancements to water conservation technologies.<sup>63</sup>
- **Waste Management Sector:** Plans to further improve recycling, reuse and reduction of solid waste will beneficially reduce the Project’s emissions level.<sup>64</sup>

As shown on Table IV-11, the Project would be consistent with all feasible and applicable strategies recommended in the Scoping Plan.

**Table IV-11  
Project Consistency With AB 32 Scoping Plan GHG Emissions Reduction Strategies**

Strategy	Project Consistency
<i>California Cap-and-Trade Program.</i> Implement a broad-based California cap-and-trade program to provide a firm limit on emissions.	N/A. The statewide program is not relevant to the Project.
<i>California Light-Duty Vehicle Greenhouse Gas Standards.</i> Implement adopted Pavley standards and planned second phase of the system. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	N/A. The development of standards is not relevant to the Project.
<i>Energy Efficiency.</i> Maximize energy efficiency building and appliance standards and pursue additional efficiency efforts including new technologies, and new policy and mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	<b>Consistent.</b> The Project would be designed and constructed to meet Cal Green building standards by including several measures designed to reduce energy consumption.
<i>Renewables Portfolio Standard.</i> Achieve 33 percent	<b>Consistent.</b> The Project would use energy

<sup>60</sup> CARB, *First Update*, pp. 37-39, 85, May 2014.

<sup>61</sup> CARB, *First Update*, pp. 40-41, May 2014.

<sup>62</sup> CARB, *First Update*, pp. 55-56, May 2014.

<sup>63</sup> CARB, *First Update*, p. 65, May 2014.

<sup>64</sup> CARB, *First Update*, p. 69, May 2014.

**Table IV-11  
Project Consistency With AB 32 Scoping Plan GHG Emissions Reduction Strategies**

Strategy	Project Consistency
renewable energy mix statewide.	from the Los Angeles Department of Water and Power, which has goals to diversify its portfolio of energy sources to increase the use of renewable energy.
<i>Low-Carbon Fuel Standard.</i> Develop and adopt the Low Carbon Fuel Standard.	N/A. The statewide program is not relevant to the Project. N/A. The development of regional planning goals is not relevant to the Proposed Project. The project's infill location near Los Angeles County Metropolitan Transportation Authority
<i>Regional Transportation-Related Greenhouse Gases.</i> Develop regional greenhouse gas emissions reduction targets for passenger vehicles.	(i.e., Routes 256, 79, 78, 378) and the City of Los Angeles DASfl El Sereno City Terrace route transit services make it consistent with the smart growth objectives of the region's Sustainable Communities Strategy (SCS).
<i>Vehicle Efficiency Measures.</i> Implement light-duty vehicle efficiency measures.	N/A. State agencies are responsible for implementing efficiency measures.
<i>Goods Movement.</i> Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	N/A. State agencies are responsible for implementing regulations and promoting efficiency in goods movement.
<i>Million Solar Roofs Program.</i> Install 3,000 MW of solar-electric capacity under California's existing solar programs.	Neutral. The Project does not include solar roofs and is not part of the proposed Statewide initiative.
<i>Medium/Heavy-Duty Vehicles.</i> Adopt medium and heavy-duty vehicle efficiency measures.	N/A. State agencies are responsible for implementing efficiency measures.
<i>Industrial Emissions.</i> Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission.	N/A. This measure addresses industrial facilities.
<i>High Speed Rail.</i> Support implementation of a high speed rail system.	N/A. This calls for the California High Speed Rail Authority and stakeholders to develop a statewide rail transportation system.
<i>Green Building Strategy.</i> Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	Consistent. The Project would be designed and constructed to meet Cal Green building standards and would include several measures designed to reduce energy consumption.
<i>High Global Warming Potential Gases.</i> Adopt measures to reduce high global warming potential gases.	N/A. State agencies are responsible for implementing these measures.
<i>Recycling and Waste.</i> Reduce methane emissions at landfills. Increase waste diversion, composting and other	Consistent. The Project would have minimal impact on solid waste facilities.



**Table IV-11  
Project Consistency With AB 32 Scoping Plan GHG Emissions Reduction Strategies**

Strategy	Project Consistency
beneficial uses of organic materials and mandate commercial recycling. Move toward zero waste.	
<i>Sustainable Forests.</i> Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	N/A. Resource Agency departments are responsible for implementing this measure.
<i>Water.</i> Continue efficiency programs and use cleaner energy sources to move and treat water.	<b>Consistent.</b> The project would use water-efficient landscaping including point-to-point irrigation and a smart controller drip system to reduce water use.
<i>Agriculture.</i> In the near-term, encourage investment in manure digester and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	N/A. The Project does not include agricultural facilities.
<i>Source: DKA Planning, 2016.</i>	

#### Consistency with SCAG's 2016-2040 RTP/SCS

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

The Project is an infill development that is also consistent with the 2016 RTP/SCS and its focus on integrated land use planning. Specifically, the Project site is served by both Metro Route 256 and the LADOT's El Sereno/City Terrace community shuttle. Table IV-12 illustrates the Project's consistency with the Actions and Strategies set forth in the 2016-2040 RTP/SCS. The Project would also be consistent with the applicable goals and principles set forth in the 2016-2040 RTP/SCS and the Compass Growth Vision Report. Therefore, the Project would be consistent with the GHG reduction related actions and strategies contained in the 2016-2040 RTP/SCS.

**Table IV-12  
Project Consistency with SCAG 2016-2040 RTP/SCS**

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
<b>Land Use Strategies</b>		
Reflect the changing population and demands, including combating gentrification and displacement, by increasing housing supply at a variety of affordability levels.	Local jurisdictions	<b>Consistent.</b> The Project includes residences that would add to the supply of housing in metropolitan Los Angeles County.
Focus new growth around transit.	Local Jurisdictions	<b>Consistent.</b> The Project is an infill development that would be consistent with the 2016 RTP/SCS focus on growing near transit facilities.
Plan for growth around livable corridors, including growth on the Livable Corridors network.	SCAG, Local Jurisdictions	<b>Consistent.</b> The Project is an infill development that would be consistent with the 2016 RTP/SCS focus on growing along the 2,980 miles of Livable Corridors in the region.
Provide more options for short trips through Neighborhood Mobility Areas and Complete Communities.	SCAG, Local Jurisdictions	<b>Consistent.</b> The Project would help further jobs/housing balance objectives that can improve the use of Neighborhood Electric Vehicles for short trips, by pre-wiring for electric vehicles. The Project is also generally consistent with the Complete Communities initiative that focuses on creation of mixed-use districts in growth areas.
Support local sustainability planning, including developing sustainable planning and design policies, sustainable zoning codes, and Climate Action Plans.	Local Jurisdictions	<b>Not Applicable.</b> While this strategy calls on local governments to adopt General Plan updates, zoning codes, and Climate Action Plans to further sustainable communities, the Project would not interfere with such policymaking and would be consistent with those policy objectives.
Protect natural and farm lands, including developing conservation strategies.	SCAG Local Jurisdictions	<b>Consistent.</b> The Project is an infill development that would help reduce demand for growth in urbanizing areas.
<b>Transportation Strategies</b>		
Preserve our existing transportation system.	SCAG County Transportation Commissions Local Jurisdictions	<b>Not Applicable.</b> While this strategy calls on investing in the maintenance of our existing transportation system, the Project would not interfere with such policymaking.
Manage congestion through programs like the Congestion Management	County Transportation Commissions	<b>Consistent.</b> The Project is an infill development that will minimize congestion impacts on the region because of its proximity to public transit, Complete

**Table IV-12  
Project Consistency with SCAG 2016-2040 RTP/SCS**

<b>Actions and Strategies</b>	<b>Responsible Party(ies)</b>	<b>Consistency Analysis</b>
Program, Transportation Demand Management, and Transportation Systems Management strategies.	Local Jurisdictions	Communities, and general density of population and jobs.
Promote safety and security in the transportation system.	SCAG County Transportation Commissions Local Jurisdictions	<b>Not Applicable.</b> While this strategy aims to improve the safety of the transportation system and protect users from security threats, the Project would not interfere with such policymaking.
Complete our transit, passenger rail, active transportation, highways and arterials, regional express lanes, goods movement, and airport ground transportation systems.	SCAG County Transportation Commissions Local Jurisdictions	<b>Not Applicable.</b> This strategy calls for transportation planning partners to implement major capital and operational projects that are designed to address regional growth. The Project would not interfere with this larger goal of investing in the transportation system.
<b><i>Technological Innovation and 21st Century Transportation</i></b>		
Promote zero-emissions vehicles.	SCAG Local Jurisdictions	<b>Consistent.</b> While this action/strategy is not necessarily applicable on a project-specific basis, the Project would include pre-wiring for electric vehicle charging infrastructure.
Promote neighborhood electric vehicles.	SCAG Local Jurisdictions	<b>Consistent.</b> While this action/strategy is not necessarily applicable on a project-specific basis, the Project would include pre-wiring for electric vehicle charging infrastructure.
Implement shared mobility programs.	SCAG Local Jurisdictions	<b>Not Applicable.</b> While this strategy is designed to integrate new technologies for last-mile and alternative transportation programs, the Proposed Project would not interfere with these emerging programs.
Source: Southern California Association of Governments; 2016-2040 RTP/SCS, Chapter 5: The Road to Greater Mobility and Sustainable Growth; April 2016.		

### Consistency with the City of Los Angeles Mobility Plan 2035

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

of GHG tracking program that would quantify reductions in GHG from reductions in vehicle miles traveled.

#### **Consistency with the City of Los Angeles ClimateLA Plan**

Construction of the Project would be consistent with the "ClimateLA" plan's goal of reducing or recycling 70 percent of trash (including construction waste) by 2015. The Project would promote this goal by complying with waste reduction measures mandated by CALGreen and City's Green Building Code, as well as solid waste diversion policies administered by CalRecycle that in turn reduce GHG emissions.

Long-term operations of the Project also would be consistent with the "ClimateLA" focus on transportation, energy, water use, land use, waste, open space and greening, and economic factors to achieve emissions reductions.

With regard to transportation, the Project is consistent with the Plan's focus on reducing emissions from private vehicle use. Specifically, the site's infill location with immediate access to significant public transit, pedestrian, and bicycle facilities results in a transit-oriented development that will reduce auto dependence.

To reduce emissions from energy usage, the Project would be consistent with "ClimateLA" and its focus on increasing the amount of renewable energy provided by the Los Angeles Department of Water and Power; presenting a comprehensive set of green building policies to guide and support private sector development; and helping citizens to use less energy. Both construction and operational activities from the Project site would generate energy-related emissions that are reduced by the State's renewable portfolio mandates, including SR 350, which requires that at least 50 percent of electricity generated and sold to retail customers come from renewable energy sources by December 31, 2030.

With regard to water, the Project would be consistent with reducing water from growth through water conservation and recycling; reducing per capita water consumption by 20 percent; and implementing the City's water and wastewater integrated resources plan that will increase conservation, and maximize the capture and reuse of storm water. Specifically, the Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions, as well as CALGreen and City Green Building Code that call for water-conserving fixtures and processes. These elements of the Project would be consistent with goals set forth in the "ClimateLA" plan.

With regard to waste, the Project would be consistent with the "ClimateLA" goal of reducing or recycling 70 percent of trash by 2015. Operational efficiencies will be built into the Project that reduce energy use and waste, as mandated by the City's Green Building Code and CALGreen building code. With regard to ongoing operations, the Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

With regard to open space and greening, the Project would not interfere with "ClimateLA" and its focus on creating 35 new parks; revitalizing the Los Angeles River to create open space opportunities; planting one million trees throughout the City; identifying opportunities to "daylight" streams; identifying promising locations for stormwater infiltration to recharge groundwater aquifers; and collaborating with schools to create more parks in neighborhoods.

#### **Consistency with the City of Los Angeles Green Building Ordinance**

The Los Angeles Green Building Ordinance requires that Projects filed on or after January 1, 2014 comply with the Los Angeles Green Building Code as amended to comply with the 2013 CALGreen Code. Because the Project includes fewer than 50 homes, the Project would not be subject to the mandatory measures under the Green Building Ordinance that would help reduce GHG emissions. The Project would comply with these mandatory measures, as the Project would provide on-site bicycle parking spaces. Furthermore, the Green Building Ordinance includes measures that would increase energy efficiency on the Project Site, including installing Energy Star rated appliances and installation of water-conserving fixtures. Therefore, the Project is consistent with the Los Angeles Green Building Ordinance.

The Project's design features as required by CALGreen would nevertheless be compatible with the City of Los Angeles' Green Building Ordinance standards that reduce emissions beyond a NAT scenario and are consistent.

The Project would be consistent with applicable State, regional and local GHG reduction strategies. Given that the Project would generate GHG emissions that are less than significant, and given that GHG emission impacts are cumulative in nature, the Project's incremental contribution to cumulatively significant GHG emissions would be less than cumulatively considerable, and impacts would be less than significant.

#### **Cumulative Impacts**

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

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

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

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

As part of SCAG's 2016-2040 SCS/RTP, a reduction in VMT within the region is a key component to achieve the 2020 and 2035 GHG emission reduction targets established by CARB. The Project results in significant VMT reduction in comparison to NAT and would be consistent with the SCS RTP.

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

Additionally, the Project has incorporated sustainability design features in accordance with regulatory requirements as provided in the regulatory compliance measures throughout this analysis and project design features to reduce VMT (i.e., the Project site's location adjacent to transit service) and to reduce the Project's potential impact with respect to GHG emissions. With implementation of these features, the Project results in a 31 percent reduction in GHG emissions from NAT. The Project's GHG reduction measures make the Project consistent with AB 32.

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

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

## **8. HAZARDS AND HAZARDOUS MATERIALS**

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

**No Impact.** The Project includes development of 42 single-family residential homes and would not require routine transport, use, or disposal of hazardous materials. Thus, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, no impacts related to this issue would occur.

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

**No Impact.** A Phase I Environmental Site Assessment (ESA) was prepared for the Project by AEI Consultants (refer to Appendix F). The following are the findings of the assessment:

**Recognized Environmental Condition (REC)** is defined by the ASTM Standard Practice E1527-13 as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. AEI's assessment has revealed the following RECs associated with the subject property or nearby properties:

- Based on a review of aerial photographs, there is a potential that the subject property was historically used for agricultural purposes. There is a potential that agricultural chemicals, such as pesticides, herbicides and fertilizers, were used on site, and that the subject property has been

impacted by the use of such agricultural chemicals. In general, historical agricultural use is not the subject of environmental enforcement actions by regulatory agencies, and therefore, could be considered a de minimis condition. Additionally, potential agricultural uses were only noted in 1923; by 1928 potential agricultural uses had ceased. As such, any potential agricultural chemicals would have likely naturally attenuated since this time. However, AEI understands that the subject property is slated for redevelopment. Consequently, it is considered prudent to determine whether sampling relating to the former agricultural use of the subject property is required by the local planning department or other applicable oversight agency prior to the commencement of redevelopment activities. As such, AEI contacted the local planning department to determine whether sampling relating to the former agricultural use of the subject property is required in preparation for development, and the agency stated that no such requirements exist at this time.

Controlled Recognized Environmental Condition (CREC) is defined by the ASTM Standard Practice E1527-13 as a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls. AEI's assessment has revealed the following CRECs associated with the subject property or nearby properties:

- No on-site CRECs were identified during the course of this assessment.

Historical Recognized Environmental Condition (HREC) is defined by the ASTM Standard Practice E1527-13 as a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls. AEI's assessment has revealed the following HRECs associated with the subject property or nearby properties:

- No on-site HRECs were identified during the course of this assessment.

Other Environmental Considerations warrant discussion, but do not qualify as RECs as defined by the ASTM Standard Practice E1527-13. These include, but are not limited to, de minimis conditions and/or environmental considerations such as the presence of ACMs, LBP, radon, mold, and lead in drinking water, which can affect the liabilities and financial obligations of the client, the health and safety of site occupants, and the value and marketability of the subject property. AEI's assessment has revealed the following environmental considerations associated with the subject property or nearby properties:

- Although access to the subject property is currently gated, the area was formerly accessible by the general public. The subject property appears to have been utilized for unauthorized dumping of waste building materials, tires, and other equipment. Mr. Al Benegas, key site manager, indicated these materials were planned to be removed during the demolition of the current structures at the property. No dumping of hazardous materials was observed. No evidence of impact to the subject



property, such as surface staining, odors, stressed vegetation, or spillage of contents, was observed. Based on this information, the materials are not considered to represent evidence of a recognized environmental condition. However, the materials represent a housekeeping concern, and should be removed from the property. Additionally, it should be noted that if any of the building materials are found to be asbestos containing, additional costs may be incurred in removing these materials.

- Based on the date of development, it is possible that the subject property was historically equipped with at least one septic system. Based on the residential nature of occupancy, any on-site septic systems are not expected to represent a significant environmental concern. However, if any septic systems are encountered upon future redevelopment, they should be addressed under local regulatory guidelines.
- The northern adjacent property (AR Morse, Steve's Auto Repair, 2700 & 2706 North Eastern Avenue) was listed in the database as a LUST site. The case was opened during tank removal of two USTs. The contaminants of concern were listed as hydrocarbons. Soil was listed as the only media impacted. The case was open in 1989 and closed in 1996. However, no other significant information about the release was available from the regulatory database report or online. This property is located across Lombardy Boulevard (approximately 50-80 feet from the property boundary) in a hydrologically downgradient position relative to the subject property. Based on the information available to date, the site may be a potential source of vapor-phase contaminant migration. A review of the LUST case file with the RWQCB may provide additional information in determining if a potential source of vapor-phase contaminant migration is present. Based on the case closure, relative distance, media impacted, time elapsed allowing for natural attenuation, identification of a responsible party, and the hydrological gradient, groundwater impacts from this adjacent site are not expected to represent a significant environmental concern at this time.

**Conclusions:** The Phase I ESA was conducted in conformance with the scope and limitations of ASTM Standard Practice E1527-13 of the subject property and revealed no evidence of RECs in connection with the subject property other than those stated above. AEI recommends no further investigations for the subject property at this time. Therefore, no impacts related to this issue would occur.

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

**No Impact.** The Project includes development of 42 single-family residential homes and would not require routine transport, use, or disposal of hazardous materials. Also, the Project site is not located within one-quarter mile of an existing or proposed school. Thus, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, no impacts related to this issue would occur.

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

**No Impact.** The Project is not included on any list compiled pursuant to Government Code Section 6892.5. Thus, the Project would not create a significant hazard to the public or the environment as a result of being listed on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, no impacts related to this issue would occur.

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

**No Impact.** The Project site is not located within two miles of a public airport. The closest airport is the El Monte Airport located approximately 11 miles northeast of the site. Thus, the Project would not result in a safety hazard associated with an airport for people residing or working in the Project area. Therefore, no impacts related to this issue would occur.

**f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?**

**No Impact.** The Project site is not located within the vicinity of a private airstrip. The closest airport is the El Monte Airport located approximately 11 miles northeast of the site. Thus, the Project would not result in a safety hazard associated with an airport for people residing or working in the Project area. Therefore, no impacts related to this issue would occur.

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

**No Impact.** No aspects of the Project would inhibit access to hospitals, emergency response centers, school locations, communication facilities, highways and bridges, or airports. Further, the Project would comply with all applicable City policies related to disaster preparedness and emergency response. Thus, no impacts related to this issue would occur.

**h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

**Less Than Significant Impact.** The Project is located within a Very High Fire Hazard Severity Zone.<sup>65</sup> The Project would be required to be designed and constructed in accordance with the Los Angeles Fire Code and would be required to incorporate measures, including but not limited the following:

- Ignition-resistant roofing and other building materials
- Fire-Retardant-Treated Wood or noncombustible materials
- Roof coverings, valleys, and gutters
- Attic ventilation
- Eave or cornice vents
- Sprinkler systems
- Landscaping with fire-retardant plants
- Vegetation clearance

Additionally, prior to issuance of an Occupancy Permit, the Project Applicant would be required to coordinate with the Los Angeles Fire Department (LAFD) to ensure that the Project incorporates all appropriate fire-prevention measures. Through compliance with the LAFD's requirements, no significant impacts related to wildland fires would occur as a result of the Project.

#### **Cumulative Impacts**

The geographic extent of the Project's environmental impacts is limited to the Project site and would not contribute to any other potential environmental impact that may occur beyond the Project site boundaries. All related projects would be subject to discretionary or ministerial review by their respective jurisdictions, which would be responsible for assessing potential hazards risks associated with those related projects, and if necessary, the applicants of those projects would be required to implement measures appropriate for the type and extent of hazardous materials present and the land use proposed to reduce the risk associated with the hazardous materials to an acceptable level. As stated previously, with mitigation, the Project would not result in any significant impacts related to hazards and hazardous materials. Therefore, no significant cumulative impacts related to hazards and hazardous materials would occur.

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<sup>65</sup> ZIMAS Report for the Project site, February 19, 2015.

## 9. HYDROLOGY AND WATER QUALITY

### a) Would the project violate any water quality standards or waste discharge requirements?

**No Impact.** The Project includes development of 42 single-family residential homes and would not have any point-source discharges. Therefore, the Project would have no impact on water quality standards or waste discharge and would not violate any water quality standards or waste discharge requirements.

### b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

**No Impact.** The Project site contains hillside areas. Subsurface materials at the Project site primarily include artificial fill, colluvium, older alluvium, and bedrock of Monterey Formation. During storm events, most of the stormwater flows from the Project site to the local streets where the runoff enters the City's storm drain system. Ten borings were conducted at the Project site to a maximum depth of 45 feet. According to the Geologic & Geotechnical Engineering Review prepared for the Project, although seepage was encountered in three of the borings, no groundwater was encountered (refer to Appendix E). It is unlikely that any stormwater that contacts the Project site reaches groundwater level. For these reasons, the Project site is not an area of groundwater recharge. All water consumption associated with the Project would be supplied by the Metropolitan Water District (MWD) and not from groundwater beneath the Project site. Thus, the Project would have no affect on groundwater supplies or recharge, and no impacts related to this issue would occur.

### c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?

**Less Than Significant Impact.** During the Project's construction phase, the Project developer would be required to implement SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site. Also, the Project developer would be required to prepare and implement a SWPPP, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization

measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion and siltation during the construction phase. Additionally, during the Project's operational phase, most of the Project site would be developed with impervious surface, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. Thus, no significant impacts related to erosion and siltation would occur as a result of Project operation.

**d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**

**Less Than Significant Impact.** As stated previously, during storm events, most of the stormwater flows from the Project site to the local streets where the runoff enters the City's storm drain system. Although implementation of the Project would result in the creation of other impervious surfaces at the Project site, such as the proposed residential homes and driveways, the Project developer would be required to implement BMPs and to develop appropriate drainage infrastructure on the site to meet regulatory water quality requirements and to control drainage from the site to not exceed existing rates. Thus, the Project would not increase the runoff from the site entering the City's existing storm drain facilities. As such, the Project would not cause flooding on or off site. Therefore, Project impacts related to flooding would be less than significant.

**e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

**Less Than Significant Impact.** As stated previously, during storm events, most of the stormwater flows from the Project site to the local streets where the runoff enters the City's storm drain system. Although implementation of the Project would result in the creation of other impervious surfaces at the Project site, such as the proposed residential building, driveways, and pedestrian walkways, the Project developer would be required to implement BMPs and to develop appropriate drainage infrastructure on the site to meet regulatory water quality requirements and to control drainage from the site to not exceed existing rates. Thus, the Project would not increase the runoff from the site entering the City's existing storm drain facilities. As such, the Project would not exceed the capacity of the existing or planning drainage system. Therefore, Project impacts related to storm drain capacity would be less than significant.

**f) Would the project otherwise substantially degrade water quality?**

**Less Than Significant Impact.** To address water quality during the Project's construction phase, the Project Applicant would be required to prepare and implement a SWPPP, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Therefore, through compliance with NPDES requirements and City grading regulations, Project construction impacts related to water quality would be less than significant.

During the Project's construction phase, in accordance with the City's Low Impact Development (LID) Ordinance, the Project Applicant would be required to incorporate appropriate stormwater pollution control measures into the design plans and submit these plans to the City's Department of Public Works, Bureau of Sanitation, Watershed Protection Division (WPD) for review and approval. Upon satisfaction that all stormwater requirements have been met, WPD staff would stamp the plan approved. Through compliance with the City's LID Ordinance, the Project would meet the City's water quality standards. Therefore, Project impacts related to operational water quality would be less than significant.

**g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**

**No Impact.** The Project site is not located within a 100-year flood hazard area. Thus, the Project would not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map. Therefore, no impacts related to this issue would occur.

**h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?**

**No Impact.** The Project site is not located within a 100-year flood hazard area. Thus, the Project would not place within a 100-year flood hazard area structures that would impede or redirect flood flows. Therefore, no impacts related to this issue would occur.

**i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?**

**No Impact.** The Project site is not located in any area susceptible to floods associated with a levee or dam. Thus, the Project would not expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. Therefore, no impacts related to this issue would occur.

**j) Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?**

**No Impact.** The Project site is not in an area susceptible to seiches, tsunamis, or mudflows. Thus, the Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. Therefore, no impacts related to this issue would occur.

### **Cumulative Impacts**

The sites of the proposed Project and the related projects are located in an urbanized area where most of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. When new construction occurs it generally does not lead to substantial additional runoff, since new developments is required to control the amount and quality of stormwater runoff coming from their respective sites. Additionally, all new development in the City is required to comply with the City's LID Ordinance and incorporate appropriate stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Therefore, cumulative impacts related to hydrology and water quality would be less than significant.

## **10. LAND USE AND PLANNING**

**a) Would the project physically divide an established community?**

**No Impact.** The Project site is located in an urbanized area of the City. The site is surrounded by existing open space, school, commercial, and residential land uses, roadways, and other infrastructure. The site is zoned and designated for residential land uses. Thus, the Project would not physically divide an established community. Therefore, no impacts related to this issue would occur.

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

**Less Than Significant Impact.** As discussed below, the Project would be substantially consistent with all of the applicable plans, policies, and regulations associated with development of the Project site. Therefore, Project impacts related to land use and planning would be less than significant.

### Regulatory Framework

#### *Regional Plans*

##### *Southern California Association of Governments*

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

##### Compass Blueprint Growth Vision Report/Compass Blueprint 2% Strategy Areas

The Compass Blueprint Growth Vision Report/Compass Blueprint 2% Strategy (the "Compass Blueprint Report"), adopted by SCAG as part of its June 2004 Southern California Compass Growth Vision Report, is an implementing mechanism for the regional growth strategies outlined in the SCAG's 1996 Regional Comprehensive Plan and Guide (the "RCPG"). The Compass Blueprint Report is intended to provide a strategy to accommodate the projected 24 million residents expected to live in the region by 2035, while balancing valuable quality of life goals. The Compass Blueprint Report emphasizes focusing growth in existing and emerging centers and along major transportation corridors, creating significant areas of mixed-use development and walkable communities, targeting growth around existing and planned transit stations, and preserving existing open space and stable residential areas.

Four principles were established for the Compass Blueprint Report that are intended to promote and maximize regional mobility, livability, prosperity, and sustainability. It is SCAG's intention that decisions regarding growth, transportation, land use, and economic development should support and be guided by these principles. Specific policy and planning strategies are also provided as a way to achieve each of the principles, as summarized below.

- \* *Principle 1. Improve mobility for all residents.* Strategies to support Principle 1 include: (1) encourage transportation investments and land use decisions that are mutually supportive; (2)



locate new housing near existing jobs and new jobs near existing housing; (3) encourage transit-oriented development; and (4) promote a variety of travel choices.

- *Principle 2. Faster livability in all communities.* Strategies to support Principle 2 include: (a) promote infill development and redevelopment to revitalize existing communities; (b) promote developments that provide a mix of uses; (c) promote “people scaled,” pedestrian friendly communities; and (d) support the preservation of stable, single-family neighborhoods.
- *Principle 3. Enable prosperity for all people.* Strategies to support Principle 3 include: (a) provide a variety of housing types in each community to meet the housing needs of all income levels; (b) support educational opportunities that promote balanced growth; (c) ensure environmental justice regardless of race, ethnicity, or income class; (d) encourage civic engagement; and (e) support local and state fiscal policies that encourage balanced growth.
- *Principle 4. Promote sustainability for future generations.* Strategies to support Principle 4 include: (a) preserve rural, agricultural, recreational, and environmentally sensitive areas; (b) focus development in urban centers and existing cities; (c) develop strategies to accommodate growth that use resources efficiently, eliminate pollution, and significantly reduce waste; and (d) utilize “green” development techniques.

The Compass Blueprint Report is a guideline for how and where the Growth Vision can be implemented. It calls for moderate changes to current land use and transportation trends in two percent of the land area of the region, known as the 2% Strategy Opportunity Areas. These areas are defined as having a high potential to implement projects, plans, and/or policies consistent with the Compass Blueprint Report principles that would result in the greatest progress towards economic, mobility, livability and sustainability benefits to local neighborhoods.

#### Regional Comprehensive Plan

SCAG has also prepared the 2008 Regional Comprehensive Plan (the “2008 RCP”) in response to SCAG’s Regional Council directive in the 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges. The 2008 RCP is an advisory document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The 2008 RCP may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. The plan incorporates principles and goals of the Compass Growth Vision Report and includes nine chapters addressing land use and housing, transportation, air quality, energy, open space, water, solid waste, economy, and security and emergency preparedness. The action plans contained therein provide a series of recommended near-term policies that developers and key stakeholders should consider for implementation, as well as potential policies for consideration by local jurisdictions and agencies when conducting project review.

The 2008 RCP replaced the RCPG for use in SCAG's Intergovernmental Review (IGR) process. SCAG's Community, Economic and Human Development Committee and the Regional Council took action to accept the 2008 RCP, which now serves as an advisory document for local governments in the SCAG region for their information and voluntary use in developing local plans and addressing local issues of regional significance. However, as indicated by SCAG, because of its advisory nature, the 2008 RCP is not used in SCAG's IGR process. Rather, SCAG reviews new projects based on consistency with the Regional Transportation Plan (the "RTP") (discussed below) and the Compass Blueprint Report.

#### 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy

On September 30, 2008, SB 375 was instituted to help achieve AB 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for the CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations to prepare a Sustainable Communities Strategy (SCS) within the RTP that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions.

On September 23, 2010, CARB adopted regional targets for the reduction of GHG emissions applying to the years 2020 and 2035. For the area under the SCAG jurisdiction, including the Project area, CARB adopted Regional Targets for reduction of GHG emissions by eight percent for 2020 and by 13 percent for 2035. On February 15, 2011, CARB's Executive Officer approved the final targets.

On April 4, 2012, the Regional Council of SCAG adopted the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (the "2012-2035 RTP/SCS"). SCAG updates the RTP/SCS every four years. Through the conduct of a continuing, comprehensive, and coordinated transportation planning process in conformance with all applicable federal and state requirements, SCAG developed and prepared its latest RTP/SCS, the Final 2016-2040 RTP/SCS (the "2016-2040 RTP/SCS"), which sets forth the long-range regional plan, policies and strategies for transportation improvements and regional growth throughout the SCAG region through the horizon year of 2040, includes a regional growth forecast that was developed by working with local jurisdictions using the most recent land use plans and policies and planning assumptions, and a financially constrained plan and a strategic plan. The constrained plan includes transportation projects that have committed, available or reasonably available revenue sources, and thus, are probable for implementation. The strategic plan is an illustrative list of additional transportation investments that the region would pursue if additional funding and regional commitment were secured. Such investments are potential candidates for inclusion in the constrained RTP/SCS through future amendments or updates. The strategic plan is provided for information purposes only and is not part of the financially constrained and conforming 2016-2040 RTP/SCS.

The 2016-2040 RTP/SCS includes a financial plan identifying the revenues committed, available or reasonably available to support the SCAG region's surface transportation investments. The financial plan was developed following basic principles including incorporation of county and local financial planning documents in the region where available, and utilization of published data sources to evaluate historical trends and augment local forecasts as needed.

The 2016-2040 RTP/SCS includes a sustainable communities strategy which sets forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, if implemented, will reduce the GHG emissions from automobiles and light trucks to achieve the regional GHG targets set by CARB for the SCAG region.

#### *South Coast Air Quality Management District*

##### Air Quality Management Plan

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

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

The current AQMP establishes a comprehensive regional air pollution control program leading to the attainment of State and federal air quality standards in the Basin. In addition to setting minimum acceptable exposure standards for specified pollutants, the AQMP incorporates SCAG's growth management strategies that can be used to reduce vehicle trips and VMT, and hence air pollution. These include, for example, co-location of employment and housing, and mixed-use land patterns that allow the integration of residential and non-residential uses.

Air quality impacts of the Project and consistency of the Project with the AQMP are discussed in response to Checklist Question 3a of this IS/MND.

### *Los Angeles County Metropolitan Transportation Authority*

#### Congestion Management Plan

The Congestion Management Plan (CMP) for Los Angeles County is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. The CMP also seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel, and to propose transportation projects, which are eligible to compete for state gas tax funds. Within Los Angeles, the Los Angeles County Metropolitan Transportation Authority (Metro) is the designated congestion management agency responsible for coordinating the CMP.

The Project's potential impacts with respect to the CMP are discussed in response to Checklist Question 16b of this IS/MND.

#### **Local Plans**

##### *City of Los Angeles*

#### City of Los Angeles General Plan

The City of Los Angeles General Plan (the "General Plan"), adopted December 1996 and re-adopted August 2001, provides general guidance on land use issues for the entire City. The General Plan consists of a Framework Element, a Land Use Element, and 10 citywide elements. The Framework Element of the General Plan serves as guide for the City's overall long-range growth and development policies and serves as a guide to update the community plans and the citywide elements. The citywide elements address functional topics that cross community boundaries, such as transportation, and address these topics in more detail than is appropriate in the Framework Element, which is the "umbrella document" that provides the direction and vision necessary to bring cohesion to the City's overall general plan. The Framework Element provides a conceptual relationship between land use and transportation, and provides guidance for future updates to the various elements of the General Plan, but does not supersede the more detailed community and specific plans. The Land Use chapter of the Framework Element contains Long Range Land Use Diagrams that depict the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, but the community plans determine the specific land use designations. The Land Use Element of the General Plan is contained within 35 community plans.

#### Northeast Los Angeles Community Plan

The Northeast Los Angeles Community Plan area was established more than 30 years ago to encompass the hills and valleys lying east of the Los Angeles River and north of the Boyle Heights Community Plan area within the City. The area serves as a transition between the downtown center of Los Angeles and the neighboring cities of Glendale, Pasadena, South Pasadena, and Alhambra to the north and east, as well as the City of Monterey Park and the unincorporated community of City of Terrace on the south.

The Community Plan area comprises some 15,000 acres and is occupied by roughly 250,000 inhabitants living in a diverse collection of communities and neighborhoods. Their histories can be traced back to the mid-nineteenth century when the first farms and orchards, subdivisions, railroad and streetcar lines, and irrigation canals were established.

By the beginning of the twentieth century, Northeast Los Angeles was a major gateway to traffic moving between Central Los Angeles and distant regions to the east and north. It was also recognized throughout the emerging metropolis as the location of major recreational resources (Eastlake Park and the Los Angeles Zoo), the largest medical facility (General Hospital), one of the area's most important centers of higher learning (Occidental College), and the City's first museum, the Southwest Museum.

By the end of the Twentieth Century, these institutions largely remain and have been augmented by the Southwest Indian Museum, the University of Southern California Health Sciences Schools, and California State University at Los Angeles, as well as a major shopping center, The Eagle Rock Plaza. However, the area's prominence in the region has been diminished since World War II because of the tremendous exodus to growing suburbs fostered by freeway development and commercial and industrial decentralization that characterized development in Southern California.

The impact of freeway development on the Plan Area cannot be overemphasized. It has provided an efficient means for developing outlying areas and allowing the resulting traffic to bypass the older industrial and commercial corridors of Northeast Los Angeles. It also had the effect of dividing former neighborhoods and communities; altering established commercial activity almost exclusively serving the immediate neighborhoods scattered along Cypress Avenue, Figueroa Street, and San Fernando Road.

These major developments in Northeast Los Angeles have changed the arrangement of land uses and the relationship of the plan area with the rest of the expanding metropolis. However, within the plan area, the distinctiveness of neighborhoods and communities persists because they are separated by hills and watercourses, and man-made features such as railroad tracks and freeways. Localized demographic, social, and economic factors have also varied over time.

The Project site falls within the El Sereno community, which is located in the southeast part of the Plan area adjacent to the cities of South Pasadena, Alhambra, and Monterey Park and City Terrace, an unincorporated community in Los Angeles County. The San Bernardino Freeway (I-10) generally corresponds to the southern boundary, and the Long Beach Freeway (I-710) and its proposed northerly extension to Pasadena parallels the eastern boundary. Huntington Drive, which formerly carried a major streetcar line is the principal commercial east-west corridor, and Eastern Avenue is the most prominent north-south commercial street.

Land uses have evolved into a complex and troublesome mixture in some areas. Residential uses are often not buffered adequately from neighboring industrial and commercial uses. Some extremely large apartment complexes intrude into older, lower density residential areas. There are also inadequate

neighborhood retail services to support the areas where several of the large residential complexes, mostly built in the 1980's, are concentrated.

Entertainment uses are almost non-existent. In recent years, Glassell Park has increased its visibility and identity in Northeast Los Angeles. The Mount Washington/Glassell Park Specific Plan is widely known as the primary mechanism regulating development east of Verdugo Road and south of El Paso Drive. Moreover, the community has erected attractive monument signs in the median of Eagle Rock Boulevard to announce itself to passing motorists.

The land use designation for the Project site in the Northeast Los Angeles Community Plan is Low Residential.

City of Los Angeles Planning and Zoning Code

All development activity in the City, including the Project site, is subject to the LAMC, particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code (the "Zoning Code"). The Zoning Code includes development standards for the various districts in the City. As shown on Figure II-4 (refer to Section II, Project Description), the Project site is currently zoned [Q]R1-1D (Qualified Condition, One-Family Zone, Height District 1) and [Q]RD6-1D (Qualified Condition, Restricted Density Multiple Dwelling Zone, Height District 1).

**Project Impacts**

*Compass Blueprint Report*

The Project's consistency with the Compass Blueprint Report is discussed on Table IV-13. As discussed, the Project would be consistent with applicable land use policies of the Compass Blueprint Report, and Project impacts related to inconsistency with this report would be less than significant.

**Table IV-13  
Project Consistency with Applicable Policies of the Compass Blueprint Report**

Policy	Project Consistency
Encourage transportation investments and land use decisions that are mutually supportive.	<b>Consistent.</b> The Project would take advantage of existing and proposed transportation investments by redeveloping the Project site with land uses that are consistent with the existing Low Residential land use designation for the Project site near existing transit lines.
Locate new housing near existing jobs and new jobs near existing housing.	<b>Consistent.</b> The Project is infill development of housing within the Northeast Los Angeles Community Plan area of the City and within proximity to transit.

**Table IV-13  
Project Consistency with Applicable Policies of the Compass Blueprint Report**

Policy	Project Consistency
Encourage transportation investments and land use decisions that are mutually supportive.	<b>Consistent.</b> The Project is infill development of housing within the Northeast Los Angeles Community Plan area of the City and within proximity to transit.
Locate new housing near existing jobs and new jobs near existing housing.	<b>Consistent.</b> The Project is infill development of housing within the Northeast Los Angeles Community Plan area of the City and within proximity to transit.
Encourage transit-oriented development.	<b>Consistent.</b> The Project site is in close proximity to existing transit lines, including Metro lines 76, 78, 79, 378, and 256 and LADOT's DASH line.
Promote a variety of travel choices.	<b>Consistent.</b> The Project site is in close proximity to existing transit lines, including Metro lines 76, 78, 79, 378, and 256 and LADOT's DASH line.
Promote infill development and redevelopment to revitalize existing communities.	<b>Consistent.</b> The Project is infill development of housing within the Northeast Los Angeles Community Plan area of the City and within proximity to transit.
Support the preservation of stable single-family neighborhoods.	<b>Consistent.</b> The Project site is zoned for single-family residential land uses, and the Project includes development of single-family homes, consistent with the existing Low Residential land use designation for the Project site and the City's Small Lot Subdivision Ordinance. The Project would be an extension of the existing single-family homes located to the northeast/east of the Project site, and would not impinge on any existing single-family neighborhoods.
Provide a variety of housing types in each community to meet the housing needs of all income levels.	<b>Consistent.</b> The Project includes development of 42 homes, each with 3 bedrooms.
Focus development in urban centers and existing cities.	<b>Consistent.</b> The Project is infill development of housing within the Northeast Los Angeles Community Plan area of the City and within proximity to transit.
Utilize "green" development techniques.	<b>Consistent.</b> The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features. The Project would also be consistent with the City of Los Angeles Building Code, which includes measures to reduce the Project's energy and water use, reduce

**Table IV-13  
Project Consistency with Applicable Policies of the Compass Blueprint Report**

Policy	Project Consistency
	waste, and reduce the carbon footprint.
Develop strategies to accommodate growth that use resources efficiently, and minimize pollution and greenhouse gas emissions.	<b>Consistent.</b> The Project includes development of single-family residential land uses, land uses that are allowed under the existing land use designation. The Project is infill development of housing within the Northeast Los Angeles Community Plan area of the City and within proximity to transit.
<p><i>Source: Southern California Association of Governments, Southern California Compass Blueprint 2% Strategy, Southern California Compass Blueprint Growth Vision Report, June 2004.</i></p>	

**2008 RCP**

A discussion of the Project's consistency with the relevant policies of the 2008 RCP is presented on Table IV-14. As discussed, the Project would be consistent with all of the applicable 2008 RCP policies, and no significant impacts related to inconsistency with the 2008 RCP would occur.

**Table IV-14  
Project Consistency with the 2008 RCP**

Policies	Consistency Discussion
<b>Land Use and Housing</b>	
<p><b>LU-4</b> Local governments should provide for new housing, consistent with State Housing Element law, to accommodate their share of forecast regional growth.</p>	<p><b>Consistent.</b> The Project would provide 42 net dwelling units, which would accommodate a share of the forecasted regional growth.</p>
<p><b>LU-4.1</b> Local governments should adopt and implement General Plan Housing Elements that accommodate housing needs identified through the Regional Housing Needs Assessment (RHNA) process. Affordable housing should be provided consistent with RHNA income category distributions adopted for each jurisdiction. To provide housing, especially affordable housing, jurisdictions should leverage existing State programs such as HCD's Workforce Incentive Program and density bonus law and create local incentives (e.g., housing trust funds, inclusionary zoning, tax-increment-financing districts in redevelopment areas and transit villages) and partnerships with non-governmental stakeholders.</p>	<p><b>Consistent.</b> As discussed in response to Checklist Question 13a, the Project would provide housing that is consistent with housing needs called out in the RHNA.</p>



**Table IV-14  
Project Consistency with the 2008 RCP**

Policies	Consistency Discussion
<p><b>LU-6.2</b> Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program.</p>	<p><b>Consistent.</b> The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features. The Project would also be consistent with the City of Los Angeles Building Code, which includes measures to reduce the Project's energy and water use, reduce waste, and reduce the carbon footprint.</p>
<p><b>Open Space and Habitat</b></p>	
<p><b>PleOSC-10</b> Developers and local governments should promote infill development and redevelopment to revitalize existing communities.</p>	<p><b>Consistent.</b> The Project is an infill development in an existing community.</p>
<p><b>OSC-11</b> Developers should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms.</p>	<p><b>Consistent.</b> The Project would incorporate sustainable building practices to eliminate pollution and reduce waste. As described above, the Project would comply with the CalGreen requirements of the California Building Code.</p>
<p><b>OSC-12</b> Developers and local governments should promote water-efficient land use and development.</p>	<p><b>Consistent.</b> The Project would comply with CalGreen requirements of the California Building Code, which includes measures to reduce the Project's energy and water use. This would include the use of drought tolerant landscaping and water efficient fixtures and plumbing.</p>
<p><b>OSC-14</b> Developers and local governments should implement mitigation for open space impacts through the following activities:</p> <ul style="list-style-type: none"> <li>• Individual projects should either avoid significant impacts to regionally significant open space resources or mitigate the significant impacts through measures consistent with regional open space policies for conserving natural lands, community open space, and farmlands. All projects should demonstrate consideration of alternatives that would avoid or reduce impacts to open space.</li> <li>• Project sponsors should ensure that transportation systems proposed in the RTP avoid or mitigate significant impacts to natural lands, community open space and important farmland, including cumulative impacts and open space impacts from the growth associated with transportation projects</li> </ul>	<p><b>Consistent.</b> The Project would be an urban infill development that avoids significant impacts to regionally significant open space resources. The Project is located on a developed site surrounded by a dense urban environment in the City. There are no rural, agricultural, recreational, or environmentally sensitive areas on the Project site.</p>

**Table IV-14  
Project Consistency with the 2008 RCP**

Policies	Consistency Discussion
<p>and improvements.</p> <ul style="list-style-type: none"> <li>Project sponsors should fully mitigate direct and indirect impacts to open space resulting from implementation of regionally significant impacts.</li> </ul>	
<b>Water</b>	
<p><b>WA-9</b> Developers and local governments should consider potential climate change hydrology and resultant impacts on available water supplies and reliability in the process of creating or modifying systems to manage water resources for both year-round use and ecosystem health.</p>	<p><b>Consistent.</b> The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features. The Project would also be consistent with the City of Los Angeles Building Code, which includes measures to reduce the Project's energy and water use, reduce waste, and reduce the carbon footprint.</p>
<p><b>WA-11</b> Developers and local governments should encourage urban development and land uses to make greater use of existing and upgraded facilities prior to measuring new infrastructure impacts.</p>	<p><b>Consistent.</b> The Project would be required to confirm with LADWP that the capacity of the existing water infrastructure could supply the domestic needs of the Project during the construction and operation phases. The Project Applicant would be required to construct any upgrade to the water infrastructure serving the Project site that is needed to accommodate the Project's water consumption needs.</p>
<p><b>WA-12</b> Developers and local governments should reduce exterior uses of water in public areas, and should promote reduced use in private homes and businesses, by shifting to drought-tolerant native landscape plants (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing water related pricing incentives.</p>	<p><b>Consistent.</b> The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features. The Project would also be consistent with the City of Los Angeles Building Code, which includes measures to reduce the Project's energy and water use, reduce waste, and reduce the carbon footprint.</p>
<p><b>WA-32</b> Developers and local governments should pursue water management practices that avoid energy waste and create energy savings/supplies.</p>	<p><b>Consistent.</b> The Project would comply with CalGreen requirements of the California Building Code for water and energy conservation.</p>
<b>Energy</b>	
<p><b>EN-8</b> Developers and local governments should include the following land use principles that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other</p>	<p><b>Consistent.</b> The Project includes development of single-family residential land uses, land uses that are allowed under the existing land use designation. The Project is infill development of housing within the</p>

**Table IV-14  
Project Consistency with the 2008 RCP**

Policies	Consistency Discussion
<p>implementation mechanisms:</p> <ul style="list-style-type: none"> <li>• Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure.</li> <li>• Land use and planning strategies to increase biking and walking trips.</li> </ul>	<p>Northeast Los Angeles Community Plan area of the City and within proximity to transit.</p>
<p><b>EN-10</b> Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> <li>• Using energy efficient materials in building design, construction, rehabilitation, and retrofit.</li> <li>• Encouraging new development to exceed Title 24 energy efficiency requirements.</li> <li>• Developing Cool Communities measures including tree planting and light-colored roofs. These measures focus on reducing ambient heat, which reduces energy consumption related to air conditioning and other cooling equipment.</li> <li>• Utilizing efficient commercial/residential space and water heaters: This could include the advertisement of existing and/or development of additional incentives for energy efficient appliance purchases to reduce excess energy use and save money. Federal tax incentives are provided online at <a href="http://www.energystar.gov/index.cfm?c=Projects_projects_x_credits">http://www.energystar.gov/index.cfm?c=Projects_projects_x_credits</a>.</li> <li>• Encouraging landscaping that requires no additional irrigation: utilizing native, drought tolerant plants can reduce water usage up to 60 percent compared to traditional lawns.</li> <li>• Encouraging combined heating and cooling (CHP), also known as cogeneration, in all buildings.</li> <li>• Encouraging neighborhood energy systems, which allow communities to generate their own electricity.</li> <li>• Orienting streets and buildings for best solar access.</li> <li>• Encouraging buildings to obtain at least 20% of their electric load from renewable energy.</li> </ul>	<p><b>Consistent.</b> The Project would meet/exceed Title 24 standards through compliance with the CalGreen standards.</p>
<p><b>EN-12</b> Developers and local governments should encourage that new buildings are able to incorporate solar panels in roofing and tap other renewable energy sources to offset</p>	<p><b>Partially Consistent.</b> Although the Project is not required to include solar panels, the Project would receive electricity supply from LADWP, which</p>

**Table IV-14  
Project Consistency with the 2008 RCP**

Policies	Consistency Discussion
new demand on conventional power sources.	obtains a portion of its electricity supplies from renewable sources.
<b>Solid Waste</b>	
<p>SW-14 Developers and local governments should integrate green building measures into project design and zoning including, but not limited to, those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Construction reduction measures to be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> <li>• Reuse and minimization of construction and demolition (C&amp;D) debris and diversion of C&amp;D waste from landfills to recycling facilities.</li> <li>• An ordinance that requires the inclusion of a waste management plan that promotes maximum C&amp;D diversion.</li> <li>• Source reduction through (1) use of building materials that are more durable and easier to repair and maintain, (2) design to generate less scrap materials through dimensional planning, (3) increased recycled content, (4) use of reclaimed building materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.).</li> <li>• Reuse of existing building structure and shell in renovation projects.</li> </ul> <p>Building lifetime waste reduction measures that should be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> <li>• Development of indoor recycling program and space.</li> <li>• Design for deconstruction</li> <li>• Design for flexibility through use of movable walls, raised floors, modular furniture, moveable task lighting, and other reusable components.</li> </ul>	<p><b>Consistent.</b> The Project would participate in a demolition and construction waste recycling program as well as an operational recycling program.</p>
<p><i>Source: Southern California Association of Governments, Regional Comprehensive Plan, October 2008.</i></p>	

**2016-2040 RTP/SCS**

The Project’s consistency with the applicable goals of the 2016-2040 RTP/SCS is discussed on Table IV-15. As discussed, the Project would be consistent with the 2016-2040 RTP/SCS. Therefore, impacts related to inconsistency with the 2016-2040 RTP/SCS would be less than significant.

**Table IV-15  
Project Consistency with the 2016-2040 RTP/SCS**

Goal	Consistency Discussion
Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking).	<b>Consistent.</b> The Project would reduce VMT by providing a residential infill development in close proximity to existing transit lines, including Metro lines 76, 78, 79, 378, and 256 and LADOT’s DASH line.
Actively encourage and create incentives for energy efficiency, where possible.	<b>Consistent.</b> The Project would comply with CalGreen requirements of the California Building Code, for water and energy conservation. The Project would exceed Title 24 standards with compliance with the City’s Green Building Ordinance and the Project would also be consistent with the City of Los Angeles Building Code, which includes measures to reduce the Project’s energy and water use, reduce waste, and reduce the carbon footprint.
Encourage land use and growth patterns that facilitate transit and non-motorized transportation.	<b>Consistent.</b> The Project would reduce VMT by providing a residential infill development in close proximity to existing transit lines.
<i>Source: Southern California Association of Governments. Regional Transportation Plan/Sustainable Communities Strategy. April 2012.</i>	

**General Plan (Framework Element)**

The Project’s consistency with the General Plan Framework Element land use policies is discussed on Table IV-16. As shown, the Project would be consistent with many of the applicable policies, and Project impacts related to inconsistency of the Project with the General Plan Framework Element would be less than significant.

**Table IV-16  
Project Consistency with Applicable Policies of the Framework Element**

Objective	Project Consistency
<i>Framework Element: Land Use Chapter</i>	
3.2.1 Provide a pattern of development consisting of distinct districts, centers, boulevards, and neighborhoods that are differentiated by their functional role, scale, and character. This shall be accomplished by considering factors such as the existing concentrations of use, community-oriented activity centers that currently or potentially service adjacent neighborhoods, and existing or potential public transit corridors and stations.	<b>Consistent.</b> The Project includes infill development of single-family residential land uses that are allowed under the existing land use designation..
3.2.2 Establish, through the Framework Long-Range Land Use Diagram, community plans, and other implementing tools, patterns and types of development that improve the integration of housing with commercial uses and the integration of public services and various densities of residential development within neighborhoods at appropriate locations.	<b>Consistent.</b> The Project includes infill development of single-family residential land uses that are allowed under the existing land use designation..
3.2.4 Provide for the siting and design of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.	<b>Consistent.</b> The Project site is zoned and designated for single-family residential land uses. The Project includes development of the Project site with single-family residential uses that are allowed under the existing land use designation..
3.7.1 Accommodate the development of multi-family residential units in areas designated in the community plans...with the density permitted for each parcel to be identified in the community plans.	<b>Consistent.</b> The Project site is zoned and designated for single-family residential land uses. The Project includes development of the Project site with single-family residential uses that are allowed under the existing land use designation for the site.
3.7.4 Improve the quality of new multi-family dwelling units based on the standards in Chapter 5 <i>Urban Form and Neighborhood Design</i> Chapter of this Element.	<b>Consistent.</b> The Project would be required to comply with all of the City's applicable design standards.
<i>Source: City of Los Angeles General Plan.</i>	

#### *Northwest Community Plan*

As discussed on Table IV-17, the Project would be consistent with all applicable policies of the Northwest Los Angeles Community Plan. As such, the Project would not result in any inconsistencies with the Plan.

Therefore, Project impacts related to inconsistency with the Northeast Los Angeles Community Plan would be less than significant.

**Table IV-17  
Project Consistency with Applicable Policies of the  
Northeast Los Angeles Community Plan**

Policy	Project Consistency
<i>Residential</i>	
1-1.1 Protect existing stable single-family and other lower density residential neighborhoods from encroachment by higher density residential and other uses that are incompatible as to scale and character or would otherwise diminish the quality of life.	<b>Consistent.</b> The Project includes development of single-family homes and is an extension of the existing single-family residential neighborhood in the existing El Sereno neighborhood within the Northeast Los Angeles Community Plan area.
1-1.2 Promote neighborhood preservation, particularly in existing single-family neighborhoods, as well as in areas with existing multiple-family residences.	<b>Consistent.</b> The Project includes development of single-family homes and is an extension of the existing single-family residential neighborhood in the existing El Sereno neighborhood within the Northeast Los Angeles Community Plan area.
1-2.1 Designate specific areas to provide for adequate residential development to accommodate anticipated increases in population while maintaining a balance between single-family and multiple-family uses.	<b>Consistent.</b> The Project includes development of single-family homes and is an extension of the existing single-family residential neighborhood in the existing El Sereno neighborhood within the Northeast Los Angeles Community Plan area. As discussed in response to Checklist Question 13a, the Project would provide housing that is consistent with housing needs called out in the RHNA.
1-3.1 Protect the quality and scale of the residential environment through attention to the appearance of communities, including attention to building and site design.	<b>Consistent.</b> The Project would comply with all of the City's applicable Design Guidelines and Standards for residential development.
1-5.1 Limit development according to the adequacy of the existing and assured street circulation system within the Plan Area and surrounding areas.	<b>Consistent.</b> As discussed in response to Checklist Question 16a, the roadway infrastructure serving the Project site would be adequate to accommodate the Project, and the Project would not result in any significant traffic impacts.
1-5.2 Ensure the availability of paved streets, adequate sewers, drainage facilities, fire protection services and facilities, and other emergency services and public utilities to support development in hillside areas.	<b>Consistent.</b> As discussed in response to Checklist Question 16a, the roadway infrastructure serving the Project site would be adequate to accommodate the Project, and the Project would not result in any significant traffic impacts.  As discussed in response to Checklist Issue 14, Public Services, existing fire and police protection services

**Table IV-17  
Project Consistency with Applicable Policies of the  
Northeast Los Angeles Community Plan**

Policy	Project Consistency
	would be adequate to serve the Project, and no significant impacts related to fire and police protection would occur.
1-5.3 Consider the steepness of the topography and the geologic stability in any proposal for development within the Plan area.	<b>Consistent.</b> The Project site is located in a hillside area. The Project would be designed and constructed in accordance with the recommendations of a Final Geotechnical Report and the City's Building Code, as required by the City.
1-5.4 Require that any proposed development be designed to enhance and be compatible with adjacent development.	<b>Consistent.</b> The Project includes development of single-family homes and is an extension of the existing single-family residential neighborhood in the existing El Sereno neighborhood within the Northeast Los Angeles Community Plan area. The Project would be required to be designed and constructed in accordance with all of the City's applicable design standards, and the Citywide Hillside Ordinance.
<i>Open Space</i>	
4-1.1 Encourage the retention of passive and visual open space which provides a balance to the urban development of the Plan Area.	<b>Consistent.</b> The Project includes development of single-family homes and is an extension of the existing single-family residential neighborhood in the existing El Sereno neighborhood within the Northeast Los Angeles Community Plan area. As discussed in response to Checklist Question 1a, the Project would not affect any scenic views.
<i>Park and Recreational Facilities</i>	
5-1.1 Preserve the existing recreational facilities and park space.	<b>Consistent.</b> The Project would not affect any designated recreational facilities or park space.
<i>Police Protection</i>	
8-1.1 Coordinate with the Police Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.	<b>Consistent.</b> As part of preparation of this MND, the Los Angeles Police Department (LAPD) was consulted to help determine what demand the Project could have on LAPD services and any mitigation measures that could be implemented to reduce Project demand. (Refer to response to Checklist Question 14ii.)



**Table IV-17  
Project Consistency with Applicable Policies of the  
Northeast Los Angeles Community Plan**

Policy	Project Consistency
8-1.3 Encourage design of building and facilities in accordance with principles that minimize opportunities for crime and enhance personal safety.	<b>Consistent.</b> The Project developer would be required to design and construct the Project in accordance with "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the LAPD.
<i>Transportation</i>	
10-1.1 Maintain Levels of Service for streets and highways not to exceed LOS "D" for secondary arterials, collector streets, and local streets; not to exceed LOS "E" on Major Highways or in the community's major business districts.	<b>Consistent.</b> A traffic impact analysis was prepared for the Project (refer to response to Checklist Question 16a.) The analysis concluded that the existing transportation facilities are adequate to accommodate the Project's traffic, and no significant impacts related to traffic would occur.
13-1.4 New development projects should be designed to minimize disturbance to existing flow with proper ingress and egress to parking.	<b>Consistent.</b> The Project would include adequate driveway access to prevent auto queuing.
<i>Source: Northeast Los Angeles Community Plan.</i>	

### **Zoning Code**

The Project site is currently zoned [Q]R1-1D (Qualified Condition, One-Family Zone, Height District 1) and [Q]RD6-1D (Qualified Condition, Restricted Density Multiple Dwelling Zone, Height District 1). To allow for development of the Project, the Project Applicant is requesting the following zoning-related discretionary approvals:

- **Vesting Tract Map (VTT) for Small Lot Purposes per LAMC Section 17.03** – Request is for the Advisory Agency to approve a Vesting Tentative Tract Map to create 42 single-family lots in accordance with the Small Lot Subdivision Ordinance No. 176,354 in the Northeast Los Angeles Community Plan.
- **Tree Removal Permit** – Request is authorization from the Board of Public Works or the Advisory Agency for the removal of a maximum of 39 protected trees, pursuant to LAMC Section 17.05.
- **Vesting Zone Change (ZC) per LAMC Section 12.32** – Request to permit a change of zone from [Q]R1-1D and [Q]RD6-1D to (T)(Q)RD5-1D.

- o The proposed Q Conditions for the Project are as follows:
  - 1) **Infrastructure.** Construction materials and equipment shall not be permitted to be stored in the public right-of-way in any manner that reduces roadway clearance to less than 20-foot in width. Storage of construction materials and equipment on public property requires a street use permit from the Bureau of Street Services.
  - 2) **Building Design.** The design of the project shall conform to the approved Project Plans. Specifically, they shall provide for and adhere to
    - a. Building materials match architectural style of new development.
    - b. Architectural design elements of the front and rear building elevations including articulation of facades, modulations of walls, shape, type details and the location of windows, doors, columns, balconies and garage doors vary from the adjacent abutting buildings.
    - c. No building or structure shall exceed 30 feet in height from adjacent finished grade, measured as the vertical distance from the adjacent finished grade of the site to an imaginary plane located above and parallel to the finished grade; except that when the roof of the uppermost story of a building or structure or portion of the building or structure has a slope of less than 25 percent, the maximum height shall be 26 feet above adjacent finished grade, with the exception of the stair enclosures to the roof decks that may exceed 26 feet in height.
    - d. The finished floor elevation directly above an exposed underfloor area shall be limited to 6 feet above finished grade. (This does not apply to cantilevers above the garages.)
    - e. Attached decks shall be limited such that no portion of the walking surface of a deck with visible underpinnings shall exceed a height of 6' above grade and decks shall be integrated into the architecture of the house, and not appear as an add-on to the primary building mass.
    - f. Lots 39 thru 42 shall be oriented so that their front entry is facing Lombardy Boulevard.
    - g. External security grilles or permanently affixed security bars attached to windows or doors shall be prohibited
  - 3) **Floor Area.** Floor Area shall be limited to a maximum of 0.75 FAR. (The first 400sf of covered parking area shall not be counted towards the maximum Floor Area.)

- 4) **Parking.** Each lot shall be provided two (2) covered parking stalls. The overall development shall provide guest parking at a ratio of 0.25 stalls per unit.
- 5) **Landscape.** The landscape design of the project shall conform to the approved Project Plans. Specifically, they shall provide for and adhere to:

- a. Landscaping palette for required landscape plans shall be comprised of drought tolerant and/or native plant material that is fire retardant and controls erosion.
- b. Retaining walls and building understory areas shall be fully screened with plantings in a reasonable amount of time, as shown on approved landscape plan

Landscape plans must be submitted to Bureau of Street Services Urban Forestry Division prior to DCP clearance. Upon satisfaction of the requirements set forth under LAMC Ordinance No. 177,404 (Protected Trees) deemed necessary by the Urban Forestry Division, an approval letter will be issued by the Urban Forestry Division and submitted with new development filings as part of submission packages.

- c. A signed "Certified Arborist's or Licensed Landscape Architect's Certificate of Compliance" must be filed with the Department of Building & Safety prior to issuance of a "Certificate of Compliance" to ensure that landscaping plans are fully implemented
- d. A public "entryway improvement" of signage, landscaping, and other distinctive elements shall be installed at the intersection of Eastern Avenue and Lombardy Boulevard as identified on the approved Landscape Plan. The area shall be maintained by the project's Homeowners Association.

- 6) **Retaining Walls.** The engineering and design of the project shall conform to the grading and wall plans shown on the approved Project Plans. Specifically, they shall provide for and adhere to:

- a. The overall development site shall be limited to a total of fifty-four (54) retaining walls as depicted on the approved Project Plans. (Walls less than 42" in height shall not be counted toward this overall limitation.)
- b. Retaining walls shall not extend beyond 6.0 feet in height.
- c. Individual walls are not limited to length and may extend beyond the proposed lot lines shown on VTT -73531-SLO so long as each future lot has no more than two (2) retaining walls/wall segments located within its bounds.

- d. Retaining walls located within the public right-of-way and required by the Bureau of Engineering – Public Works shall not count against the retaining wall limitation on this site.
  - e. All retaining walls shall provide a standard surface backdrain system and all drainage shall be conducted to the street in a non-erosive device, as required by approved Soils Report.
  - f. All retaining and garden walls shall be landscaped per the approved Landscape plan.
- 7) **Environmental.** The engineering and design of the project shall conform to the grading and wall plans that are part of the approved Project Plans. Specifically, they shall provide for and adhere to:
- a. A Geotechnical Investigation Report that evaluates the proposed project's soil and grading shall be submitted to the LADBS Grading Division for review. An approved Soils & Grading report letter from LADBS - Grading Division shall be required prior to approval of a grading, foundation or building permit.
  - b. All new graded slopes shall be no steeper than 2:1 (rise:run), except when the Grading Division has determined that slopes may exceed 2: 1 as part of an approved Soils Report.
  - c. Grading shall be limited to a maximum of 82,000 cubic yards cut and 5,000 fill. Export of soils from the project site shall be limited to 78,000 cubic yards.
  - d. To meet LID requirements, cisterns shall be installed to collect all run-off required to meet water quality standards. Rainwater collected in the cisterns shall be used for on-site landscape irrigation.
- 8) **Truck Traffic Restricted Hours.** Truck traffic directed to the project site for the purpose of delivering construction materials or construction-machinery shall be limited to the hours beginning at 8:00 AM and ending at 4:00 PM, Monday through Saturday. No truck deliveries shall occur outside of that time period. No truck queuing related to such deliveries to the project site shall occur on any local or collector street within the project vicinity outside of that time period.
- 9) **Construction Workers.** Construction workers shall be encouraged to carpool or vanpool to the Project Site during construction of the Proposed Project to reduce vehicle trips. All construction vehicles shall park on-site during construction.

- 10) **Security.** Construction fencing/canopies shall be built on Eastern Avenue and Lombardy Boulevard around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances. Construction fencing with wind-screen shall be constructed along the eastern and southern property lines adjacent to R1-1D zoned properties.
- 11) **24-Hour Contact.** A 24-hour "hotline" shall be required to receive and forward information relayed by adjacent homeowners and stakeholders to site representatives for immediate dissemination to the project team. The applicant shall be required to respond within 24 hours of any complaint received on this hotline.
- **Zoning Administrator's Determination (ZAD) per LAMC Section 12.24 X.26** – Request is to allow 54 walls varying in height from 3.5 feet to 6.0 feet in lieu of the maximum of 2 10-foot retaining walls otherwise required in LAMC Section 12.21 C.8(a).
  - **Haul Route approval** by the Board of Building & Safety Commissioners or Advisory Agency.

The existing zoning for the Project site allows for development of single-family residential homes, similar to what is proposed. The Project would meet all zoning requirements related to building height, setbacks, and parking. As such, the Project would not conflict with the zoning code. Therefore, Project impacts related to zoning inconsistency would be less than significant.

**c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?**

**No Impact.** The Project site is not subject to any applicable habitat conservation plan or natural community conservation plan. Therefore, the Project would not conflict with any applicable habitat conservation plan or natural community conservation plan.

**Cumulative Impacts**

As discussed previously, the Project would not result in any inconsistencies with any of the applicable plans, policies, or regulations associated with development of the Project site. The City would assess the consistency of the related projects with all applicable plans, policies, and regulations associated with those sites, individually. Regardless of any potentially inconsistencies the related projects may result in, because the Project would not result in any inconsistencies, the Project would not have the potential to contribute to any cumulative inconsistency impacts.

## 11. MINERAL RESOURCES

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

**No Impact.** The Project site is located in a fairly urbanized part of the City. There are no known mineral resources on the Project site or in the vicinity. Thus, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, no impacts related to issue would occur.

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

**No Impact.** The Project site is located in a fairly urbanized part of the City. The Project site is not identified as a mineral resource recovery site. Thus, the Project would not 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. Therefore, no impacts related to issue would occur.

### Cumulative Impacts

As discussed previously, the Project would not result in any impacts related to mineral resources. Regardless to what degree the related projects could result in impacts related to mineral resources, because the Project would not result in any impacts related to mineral resources, the Project would not have the potential to contribute to any cumulative impacts.

## 12. NOISE

**a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

**Less Than Significant With Mitigation Incorporated.** The information below is based on a noise modeling results prepared for the Project by DKA Planning (refer to Appendix G).

### Characteristics of Sound

Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The "A-weighted scale," abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA. Table IV-18 provides examples of A-weighted noise levels from common sources.

**Table IV-18**  
**A-Weighted Decibel Scale**

Typical A-Weighted Sound Levels	Sound Level (dBA, $L_{eq}$ )
Threshold of Pain	140
Jet Takeoff at 100 Meters	125
Jackhammer at 15 Meters	95
Heavy Diesel Truck at 15 Meters	85
Conversation at 1 Meter	60
Soft Whisper at 2 Meters	35

*Source: United States Occupational Safety & Health Administration, Noise and Hearing Conservation Technical Manual, 1999.*

### Noise Definitions

**Community Noise Equivalent Level (CNEL):** CNEL is an average sound level during a 24-hour period. CNEL is a noise measurement scale, which accounts for noise source, distance, single event duration, single event occurrence, frequency, and time of day. Human reaction to sound between 7:00 p.m. and 10:00 p.m. is as if the sound were actually 5 dBA higher than if it occurred from 7:00 a.m. to 7:00 p.m. From 10:00 p.m. to 7:00 a.m., humans perceive sound as if it were 10 dBA higher due to the lower background level. Hence, the CNEL is obtained by adding an additional 5 dBA to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and 10 dBA to sound levels in the night from 10:00 p.m. to 7:00 a.m. Because CNEL accounts for human sensitivity to sound, the CNEL 24-hour figure is always a higher number than the actual 24-hour average.

**Equivalent Noise Level ( $L_{eq}$ ):**  $L_{eq}$  is the average noise level on an energy basis for any specific time period. The  $L_{eq}$  for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound.  $L_{eq}$  can be thought of as the level of a continuous noise that has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of dBA.

### Effects of Noise

The degree to which noise can impact the environment ranges from levels that interfere with speech and sleep to levels that cause adverse health effects. Human response to noise is subjective and can vary from person to person. Factors that influence individual response include the intensity, frequency, and pattern of noise, the amount of background noise present before the intruding noise, and the nature of work or human activity that is exposed to the noise source.

### **Audible Noise Changes**

Small perceptible changes in sound level for a person with normal hearing sensitivity is approximately 3 dBA. A change of at least 5 dBA would be noticeable and would likely cause some community reaction. A 10-dBA increase is heard as a doubling in loudness and would cause a community response.

Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or "point source," will decrease by approximately 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots or smooth bodies of water) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt, grass, or scattered bushes and trees) for each doubling of the distance. For example, if a noise source produces a noise level of 89 dBA at a reference distance of 50 feet, then the noise level would be 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet, and so on. Noise generated by a mobile source will decrease by approximately 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of the distance.

Noise is most audible when traveling by direct line-of-sight.<sup>66</sup> Barriers, such as walls or buildings that break the line-of-sight between the source and the receiver can greatly reduce noise levels from the source since sound can only reach the receiver by diffraction. Sound barriers can reduce sound levels by up to 20 dBA. However, if a barrier is not high or long enough to break the line-of-sight from the source to the receiver, its effectiveness is greatly reduced.

## **REGULATORY SETTING**

### **Federal**

#### ***Noise Standards***

There are no federal noise standards that directly regulate environmental noise related to the construction or operation of the Project, which is a private development in the City. With regard to noise exposure and workers, the Office of Safety and Health Administration (OSHA) regulations safeguard the hearing of workers exposed to occupational noise.

### **State**

#### ***Noise Standards***

The California Department of Health Services (the "DHS") has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure. These guidelines for land use and noise exposure compatibility are shown on Table IV-19. In addition, Section 65302(f) of the

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<sup>66</sup> *Line-of-sight is a visual path between the noise source and the noise receptor.*



California Government Code requires each county and city in the state to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(g) requiring a noise element to be included in the general plan. The noise element must: (1) identify and appraise noise problems in the community; (2) recognize Office of Noise Control guidelines; and (3) analyze and quantify current and projected noise levels.

**Table IV-19  
Community Noise Exposure (CNEL)**

Land Use	Normally Acceptable <sup>a</sup>	Conditionally Acceptable <sup>b</sup>	Normally Unacceptable <sup>c</sup>	Clearly Unacceptable <sup>d</sup>
Single-family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 75
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 75
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 75
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 70
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 75
Playgrounds, Neighborhood Parks	50 - 70	---	67 - 75	above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	---	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	---

<sup>a</sup> *Normally Acceptable:* Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

<sup>b</sup> *Conditionally Acceptable:* New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

<sup>c</sup> *Normally Unacceptable:* New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

<sup>d</sup> *Clearly Unacceptable:* New construction or development should generally not be undertaken

Source: Office of Planning and Research, State of California General Plan Guidelines, October 2003 (in coordination with the California Department of Health Services); City of Los Angeles, General Plan Noise Element, adopted February 1999.

## City

The LAMC provides two types of noise standards that are relevant to this analysis: 1) construction noise standards, and 2) general noise ordinance standards. The construction noise standards apply only to construction activities, while the general noise ordinance standards apply to noise generated by land use activities.

### *Construction Noise Standards*

LAMC Section 41.40 regulates noise due to construction work. LAMC Section 41.40 prohibits the use of any "power driven drill, riveting machine, excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence" between the hours of 9:00 PM and 7:00 AM. Section 41.40 further states that "the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited" during the hours of 9:00 PM and 7:00 AM. LAMC Section 41.40 also prohibits any construction work, including the operation, repair, or servicing of construction equipment and the job-site delivering of construction materials, within 500 feet of residential buildings before 8:00 AM or after 6:00 PM on Saturday or national holidays or at any time on Sunday. Within the permitted construction times and distances, there are no noise limits. Construction noise intruding onto property zoned for manufacturing or industrial uses is exempted from the LAMC Section 41.40 standards.

LAMC Section 112.05 states that between the hours of 7:00 AM and 10:00 PM, in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding 75 dB(A) at a distance of 50 feet. This limit applies to construction equipment, including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors, and pneumatic or other powered equipment. This limit shall not apply where compliance is technically infeasible. The burden of proving that compliance is technically infeasible shall be on the person or persons charged with any violation of this section. Technical infeasibility shall mean that the noise limit cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction devices or techniques during the operation of the equipment.

### *General Noise Ordinance Standards*

LAMC Chapter XI, "Noise Regulation," regulates noise from non-transportation noise sources such as commercial or industrial operations, mechanical equipment or residential activities. Although these regulations do not apply to vehicles operating on public rights-of-way, the regulations do apply to noise generated by vehicles on private property, such as truck operations at commercial or industrial facilities. The exact noise standards vary depending on the type of noise source, but the allowable noise levels are generally determined relative to the existing ambient noise levels at the affected location. LAMC Section

111.01 (a) defines the ambient noise as "the composite of noise from all sources near and far in a given environment, exclusive of occasional and transient intrusive noise sources and of the particular noise source or sources to be measured. Ambient noise shall be averaged over a period of at least 15 minutes..." LAMC Section 111.03 provides minimum ambient noise levels for various land uses, as described on Table IV-20. In the event that the actual measured ambient level at a subject location is lower than that provided in the table, the level in the table shall be assumed.

**Table IV-20**  
**City of Los Angeles Minimum Ambient Noise Levels**

Zone	Allowable Average Noise Level ( $L_{eq}$ )	
	Daytime (7 am – 10 pm)	Nighttime (10 pm – 7 am)
A1, A2, RA, RE, RS, RD, RW1, RW2, R1, R2, R3, R4, and R5	50 dB(A)	40 dB(A)
P, PB, CR, C1, C1.5, C2, C4, C5, and CM	60 dB(A)	55 dB(A)
M1, MR1, and MR2	60 dB(A)	55 dB(A)
M2 and M3	65 dB(A)	65 dB(A)
<i>Source: LAMC</i>		

At the boundary line between two zones, the allowable noise level of the quieter zone shall be used. The allowable noise levels are then adjusted if certain conditions apply to the alleged offensive noise, as follows:

- For steady tone noise with an audible fundamental frequency or overtones (except for noise emanating from any electrical transformer or gas metering and pressure control equipment existing and installed prior to September 8, 1986) – reduce allowable noise level by 5 dB(A).
- For repeated impulsive noise – reduce allowable noise level by 5 dB(A).
- For noise occurring less than 15 minutes in any period of 60 consecutive minutes between the hours of 7:00 AM and 10:00 PM – increase allowable noise level by 5 dB(A).

The City's noise ordinance is not explicit in defining the length of time over which an average noise level should be assessed. However, based on the noted reference to "60 consecutive minutes," above, it is concluded that the one-hour  $L_{eq}$  metric should be used.

Regarding the location at which the noise measurements should be taken, the LAMC states that "except when impractical, the microphone shall be located four to five feet above the ground and ten feet or more from the nearest reflective surface. However, in those cases where another elevation is deemed appropriated, the latter shall be utilized."

LAMC Section 112.02 addresses noise from air conditioning, refrigeration, heating, pumping, and filtering equipment. The section states that such equipment may not generate noise that would exceed the ambient noise level at any adjacent property by more than 5 dB(A).

LAMC Section 114.02 addresses noise from motor driven vehicles (the LAMC only addresses vehicles on private property and does not address vehicles on public highways). The section states that such vehicles may not generate noise that would exceed the ambient noise level at any occupied residential property by more than 5 dB(A).

LAMC Section 114.03 states that "It shall be unlawful for any person, between the hours of 10:00 PM and 7:00 AM of the following day, to load or unload any vehicle, or operate any dollies, carts, forklifts, or other wheeled equipment, which causes any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building."

## **Project Impacts**

### ***Construction Noise***

During demolition, construction, ground clearing, grading, structural, and other noise-generating activities would occur at the Project site between the hours of 7:00 a.m. and 9:00 p.m. in accordance with the LAMC. Table IV-21 summarizes projected noise levels at nearby sensitive receptors during construction. Land uses on the properties surrounding the Project site include an elementary school, and single- and multi-family residential buildings. There are a number of nearby sensitive receptors to the Project site, including the following:

- Farndale Elementary School, 90 feet northwest of the Project site
- 2635 Lombardy Avenue, single family residence about 15 feet east of Project site
- 2543 Mallory Street, single family residence about 15 feet east of Project site
- 2518 Eastern Avenue, multi-family residences 15 feet south of the Project site
- Klamath Street residences, directly south of the Project site

To ascertain current ambient noise levels at nearby receptors, DKA Planning took short-term, 15-minute noise readings on April 10, 2015 using a Quest Technologies SoundPro DL Sound Level Meter.<sup>67</sup> Noise

<sup>67</sup> The SoundPro meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental noise measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground. Weather conditions were clear with negligible wind.

measurements were taken at the first four locations near the Project site. Predominant noise was caused by motor vehicles traveling on adjacent roadways, including Eastern and Lombardy Avenues, including bus stops at the intersection of these two arterials. As shown on Table IV-21, ambient noise levels ranged from 61.0 dBA  $L_{eq}$  at the residence at 2543 Mallory Street to 71.6 dBA  $L_{eq}$  at Farmdale Elementary School.

Table IV-21  
Construction Noise Levels - Unmitigated

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, $L_{eq}$ )	New Ambient (dBA, $L_{eq}$ )	Increase
Residence, 2543 Mallory Street	15	78.5	61.0	78.6	17.6
Residence, 2635 Lombardy Avenue	15	81.5	62.8	81.6	18.8
Residences, 2518 Eastern Avenue	15	81.5	69.7	81.8	12.1
Farmdale Elementary School	90	76.4	71.6	77.6	6.0

Source: DKA Planning, 2015.

Construction activities would generate noise from construction activities that would vary over the 24 months of activity on- and off-site, and would include on-site equipment such as scrapers, tractors, loaders and smaller equipment such as saws, hammers, and pneumatic tools associated with the Project's construction. There would be secondary noise from construction worker vehicles and vendor deliveries. Given the ambient conditions in the neighborhood and the proximity of the nearby receptors, significant noise impacts could occur at all five monitoring locations during construction of the Project.

- Noise levels of up to 81.8 dBA are projected at the residences at 2518 Eastern Avenue, an increase of 12.1 dBA. This elevated noise level would exceed the 75 dBA limit established in the LAMC for construction machinery at 50 feet. These would also exceed the 5 dB noise increase considered to be a noise violation by the LAMC.
- Noise levels of up to 81.6 dBA are projected at the residence at 2635 Lombardy Avenue, an increase of 18.8 dBA. This elevated noise level would exceed the 75 dBA limit established in the LAMC for construction machinery at 50 feet. These would also exceed the 5 dB noise increase considered to be a noise violation by the LAMC.
- Noise levels of up to 78.6 dBA are projected at the residence at 2543 Mallory Street, an increase of 17.6 dBA. This elevated noise level would exceed the 75 dBA limit established in the LAMC for construction machinery at 50 feet. This would also exceed the 5 dB noise increase considered to be a noise violation by the LAMC.
- Noise levels of up to 77.6 dBA are projected at Farmdale Elementary School, an increase of 6.0 dBA. This elevated noise level would exceed the 75 dBA limit established in the LAMC for

construction machinery at 50 feet. This would also exceed the 5 dB noise increase considered to be a noise violation by the LAMC.

These on-site construction-related noise impacts would be significant. However, implementation of Mitigation Measures 12-1 through 12-6 would reduce the Project's construction noise impact to less than significant (refer to Table IV-24 shown after the list of Noise Mitigation Measures).

With regard to off-site construction-related noise impacts, up to 7,800 haul truck trips are expected to remove up to 78,000 cubic yards of cut materials from the Project site, conservatively assuming 10 cubic yards of soil capacity per haul truck. This cut material could be transported 20 miles to nearby landfills by ten-wheeled heavy-duty trucks. This would equate to an average of approximately 87 haul trips per day over a three-month grading period. While such vehicle activity would marginally increase ambient noise levels along local roadways, this is not expected to significantly increase ambient noise levels by 5 dBA at sensitive receptors for two reasons. First, this level of haul activity would average four haul trips per hour onto local streets, which would not produce sustained increases in noise levels over an hour or any other monitoring period. As noted in the City's "L.A. CEQA Thresholds Guide," a 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming travel speed and fleet mix remain constant. Second, the Project site is immediately adjacent to two freeways (i.e., San Bernardino and Long Beach freeways) and allows immediate access for haul trucks that would avoid travel on local roads with sensitive receptors. This noise impact would be significant. However, implementation of Mitigation Measure 12-7 would reduce the Project's construction noise impact to less than significant by ensuring the haul truck's immediate ingress onto either of the two adjacent freeways.

### ***Operational Noise***

During Project operations, the development would produce both direct noise impacts on the site from residential-related activities, as well as indirect noise impacts from vehicles traveling on local roads to access the site. The direct impacts would include stationary noises from sources associated with building operations, such as heating, ventilation, and air conditioning (HVAC) systems.

Section 41.40 and Chapter XI, Articles 1 through 6, of the LAMC requires that noise generated by mechanical equipment not exceed 5 dBA above ambient noise levels at adjacent property lines. Large ground level heating, ventilation, and HVAC systems typically generate noise levels between 50 and 65 dBA at 50 feet.<sup>68</sup> Roof-top mounted equipment typically produces noise levels of up to approximately 56 dBA at 50 feet. Based on the distance from the Project site to nearby receptors, the ambient noise levels, and the relatively quiet operation of HVAC systems, there would not increase in ambient noise levels from these on-site noise sources. Therefore, noise impacts associated with stationary noise would be less than significant.

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<sup>68</sup> Los Angeles Department of City Planning, *San Pedro Community Plan Draft EIR*, August 2012.

The majority of operational noise impacts would be from indirect noise impacts associated with the 400 net new vehicle trips each weekday.<sup>69</sup> During the peak morning hour, the Project would add 32 new vehicle trips to local roadways and 42 trips in the peak evening hour, an average of up to 0.75 vehicle trip per minute. This increased vehicle traffic would result in inaudible increases in roadway noise. As noted in the City's "L.A. CEQA Thresholds Guide," a 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming travel speed and fleet mix remain constant.

As a result, mobile noise generated by the Project would not cause the ambient noise level measured at the property lines of adjacent uses along affected roadways to rise to the "normally unacceptable" or "clearly unacceptable" category as defined by the 2003 California General Plan Guidelines or result in any 5 dBA or more increase in noise level. As a result, noise impacts associated with these inaudible, off-site vehicular noise would be less than significant.

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

**Less Than Significant Impact.** The information below is based on a noise modeling results prepared for the Project by DKA Planning (refer to Appendix G).

#### **Characteristics of Vibration**

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Unlike noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible. Common sources of vibration include trains, buses, and some construction activities.

#### ***Vibration Definitions***

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings and is usually measured in inches per second. The root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (VdB) is commonly used to measure RMS. The decibel notation acts to compress the range of numbers required to describe vibration.<sup>70</sup>

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<sup>69</sup> KOA Corporation, *Trip Generation Review – Proposed Project at 2520-2608 North Eastern Avenue, El Sereno*, March 19, 2015.

<sup>70</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

### Effects of Vibration

High levels of vibration may cause physical personal injury or damage to buildings. However, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that may affect concentration or disturb sleep. In addition, high levels of ground-borne vibration may damage fragile buildings or interfere with equipment that is highly sensitive to ground-borne vibration.

### Perceptible Vibration Changes

Unlike noise, ground-borne vibration is not an environmental issue that most people experience every day. The background vibration velocity level in residential areas is usually 50 RMS or lower, well below the threshold of perception for humans, which is around 65 RMS.<sup>71</sup> Most perceptible indoor vibration is caused by sources within buildings, such as movement of people or slamming of doors. Typical outdoor sources of ground-borne vibration are construction equipment, trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is typically not perceptible.

### Applicable Regulations

To counter the effects of ground-borne vibration, the Federal Transit Administration (FTA) has published guidance relative to vibration impacts. According to the FTA, non-engineered timber and mason buildings can be exposed to ground-borne vibration levels of 0.2 inches per second without experiencing structural damage, while reinforced-concrete, steel, or timber buildings can be exposed to ground-borne vibration levels of 0.5 inches per second.<sup>72</sup>

In terms of construction-related impacts on buildings, the City has not adopted policies or guidelines relative to groundborne vibration. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as both the City and the County of Los Angeles do not have a significance threshold to assess vibration impacts during construction, the FTA and California Department of Transportation's (Caltrans) adopted vibration standards for buildings are used to evaluate potential impacts related to Project construction. Based on these standards, impacts relative to groundborne vibration would be considered significant if the following were to occur:

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<sup>71</sup> *Ibid.*

<sup>72</sup> *Ibid.*



- Project construction activities would cause a PPV groundborne vibration level to exceed 0.5 inches per second at any off-site reinforced-concrete, steel, or timber structure;
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.2 inches per second at any non-engineered timber and masonry buildings (i.e., “fragile” buildings);<sup>73</sup> and
- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.12 inches per second at any building that is extremely susceptible to vibration damage (i.e., “extremely fragile” buildings).<sup>74</sup>

Table IV-22 identifies PPV and RMS velocity (in VdB) levels for the types of off-road and on-road equipment that could operate at the Project site during construction.

**Table IV-22**  
**Vibration Source Levels for Construction Equipment**

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

*Source: Federal Transit Administration 2006*

### Project Vibration Impacts

As shown on Table IV-22, vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity, with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

Groundborne vibration would be generated by a number of construction activities. Vibration velocities projected to occur at the nearest off-site sensitive receptor would produce up to a 0.191 inches/second PPV at the three residential sites adjacent to the Project site that were analyzed. This PPV is below the 0.2 inches/second that are considered potentially harmful levels of vibration for a non-engineered timber

<sup>73</sup> *Ibid.*

<sup>74</sup> *Ibid.*

and masonry building. Other potential types of construction equipment would produce less vibration and have lesser potential impacts on neighboring sensitive receptors. As shown on Table IV-23, the peak particle velocity and vibration levels that would occur at these on- and off-site sensitive uses during construction would be less than the thresholds associated with building damage. Therefore, construction-related vibration impacts would be less than significant.

**Table IV-23**  
**Vibration Levels at Off-Site Sensitive Uses from Project Construction**

Sensitive Uses Offsite	Distance to Project Site (ft.)	Estimated PPV (in/sec) <sup>a</sup>	Estimated Vibration Levels (VdB) <sup>b</sup>
Residence, 2543 Mallory Street	15	0.191	0.2
Residence, 2635 Lombardy Avenue	15	0.191	0.2
Residences, 2518 Eastern Avenue	15	0.191	0.2
Fanndale Elementary School	90	0.013	0.2

<sup>a</sup> The vibration velocities at the off-site sensitive uses are determined with the following equation from the Federal Transit Administration's Transit Noise and Vibration Impact Assessment, Final Report:  $PPV_{\text{equip}} = PPV_{\text{ref}} \times (25/D)^{1.5}$ , where  $PPV_{\text{equip}}$  = peak particle velocity in in/sec of equipment,  $PPV_{\text{ref}}$  = reference vibration level in in/sec at 25 feet,  $D$  = distance from the equipment to the receiver.

<sup>b</sup> The vibration levels at the off-site sensitive uses are determined with the following equation from the Federal Transit Administration's Transit Noise and Vibration Impact Assessment, Final Report:  $L_v(D) = L_v(25 \text{ ft}) - 30 \log(D/25)$ , where  $L_v$  = vibration level of equipment,  $D$  = distance from the equipment to the receiver,  $L_v(25 \text{ ft})$  = vibration level of equipment at 25 feet.

Source: Source: DKA Planning 2015.

c) **Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

**Less Than Significant With Mitigation Incorporated.** As discussed in response to Checklist Question 12a, with mitigation, the Project would not generate a substantial permanent increase in noise in excess of City noise standards. Therefore, Project impacts related to permanent noise increase would be less than significant.

d) **Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

**Less Than Significant With Mitigation Incorporated.** As discussed in response to Checklist Question 12a, with mitigation, the Project would not result in a substantial temporary or periodic increase in ambient noise levels in excess of City noise standards. Therefore, Project impacts related to temporary or periodic noise increase would be less than significant.

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

**No Impact.** The Project site is not located within an airport land use plan or within two miles of a public airport or public use airport. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels and no impact would occur.

**f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?**

**No Impact.** The Project site is not located in the vicinity of a private airstrip. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels and no impact would occur.

#### **Mitigation Measures (Noise)**

To ensure that the Project would not result in significant noise impacts during construction, the following mitigation measures are required (refer to Table IV-24):

- 12-1: The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.
- 12-2: Two weeks prior to commencement of construction, notification shall be provided to the off-site residential and school uses within 500 feet of the Project site that discloses the construction schedule, including the types of activities and equipment that would be used throughout the duration of the construction period.
- 12-3: Temporary sound barriers, capable of achieving a sound attenuation of at least 10 dBA (e.g., construction sound wall with sound blankets), and capable of blocking the line-of-sight to the adjacent residences shall be installed as feasible.
- 12-4: Noise-generating construction equipment operated at the Project Site shall be equipped with effective state-of-the-art noise control devices, i.e., mufflers, lagging, solar power or electric plug-in on-site power generators and/or motor enclosures or other shielding equipment. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

- 12-5: All construction areas for staging and warming-up equipment shall be located as far as possible from adjacent residences.
- 12-6: Portable noise sheds for smaller, noisy equipment, such as air compressors, dewatering pumps, and generators shall be provided where feasible.
- 12-7: A haul route for exporting cut materials from the site to a nearby landfill that access the San Bernardino and/or Long Beach Freeways should minimize travel on residential streets with sensitive receptors.

**Table IV-24**  
**Construction Noise Levels - Mitigated**

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, $L_{rn}$ )	New Ambient (dBA, $L_{eq}$ )	Increase
Residence, 2543 Mallery Street	15	62.5	61.0	64.8	3.8
Residence, 2635 Lombardy Avenue	15	65.5	62.8	67.4	4.6
Residences, 2518 Eastern Avenue	15	65.5	69.7	71.1	1.4
Farmdale Elementary School	90	60.4	71.6	71.8	0.3

Source: DKA Planning, 2015.

### Cumulative Impacts

None of the related projects are in close proximity to the Project site. As such, distance and intervening buildings would attenuate noise generated by construction and operational activities associated with the related projects at the Project site (and vice versa) and would not result in any significant cumulative noise impacts.

## 13. POPULATION AND HOUSING

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

**Less Than Significant Impact.** Due to the scale at which housing markets operate, the analysis of potential Project impacts is presented in terms of the following two principal geographic scales/zones around the Project site:

- **2010 Census Data.** The local Census Tracts in and around the Project site provide the smallest geographic measurable unit for existing population and housing.

- **City of Los Angeles.** SCAG's 2016-2040 RTP/SCS and the California Department of Finance consider the City as a separate unit from other cities and any unincorporated areas.

## Regulatory Framework

### *Regional*

#### *Southern California Association of Governments*

SCAG is the federally designated metropolitan planning organization for six Southern California counties including the County of Los Angeles. SCAG prepared, and adopted, the 1996 Regional Comprehensive Plan and Guide (RCPG), the 5<sup>th</sup> Cycle for 2014-2021 Regional Housing Needs Assessment (2014-2021 RHNA) (approved November 26, 2012), the 2008 Regional Transportation Plan (RTP), and the Regional Transportation Improvement Program (RTIP) to address regional growth and measure progress toward achieving regional planning goals and objectives. SCAG has released its 2008 Regional Comprehensive Plan (RCP), as an update to the adopted 1996 RCPG. In April 2016, SCAG adopted the 2016-2040 RTP/SCS based, in part, on data from the 2010 U.S. Census.

#### 2008 Regional Comprehensive Plan

SCAG prepared and issued the 2008 RCP in response to the SCAG's Regional Council directive in the 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges.

The 2008 RCP serves as a policy framework for implementation of short-term strategies and long-term initiatives to improve regional mobility and sustainability, while also directly addressing the interrelationships between natural resource sustainability, economic prosperity, and quality of life. The 2008 RCP incorporates principles and goals of the 2004 Compass Blueprint Growth Vision, as discussed below. The 2008 RCP includes nine chapter areas: Land Use and Housing, Transportation, Air Quality, Energy, Open Space and Habitat, Water, Solid Waste, Economy, and Security and Emergency Preparedness. Each chapter is organized into three sections: goals, outcomes, and action plans.

The RCP chapters that are relevant to population and housing are the Growth Management and Housing Chapters. The purpose of the Growth Management Chapter is to present forecasts which establish the socioeconomic context for the RCPG, particularly the Regional Mobility and Air Quality Chapters. It also addresses issues related to growth and land consumption by encouraging local land use actions that could ultimately lead to the development of an urban form that will help minimize development costs, save natural resources, and enhance the quality of life in the region.

The Housing Chapter includes advisory strategies for bringing housing costs and decent shelter within reach of more households in order to support the economic health and social vitality of the region. Its goals include providing for decent and affordable housing for all people; an adequate supply and

availability of housing; housing stock maintenance and preservation; and promoting a mix of housing opportunities region wide.

#### Regional Housing Needs Assessment

The RHNA is a key tool for SCAG and its member governments to plan for growth. The 2014-2021 RHNA quantifies the need for housing within each jurisdiction between 2014 and 2021. Communities then plan, consider, and decide how they will address this need through the process of completing the housing elements of their general plans. The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that they can grow in ways that enhance quality of life, and improve access to jobs, transportation and housing, without adversely impacting the environment. The RHNA is produced periodically by SCAG, as mandated by State law, to coincide with the region's schedule for preparing housing elements. It consists of two measurements of housing need: (a) existing need; and (b) future need.

The existing need assessment is based on data from the most recent U.S. Census to measure ways in which the housing market is not meeting the needs of current residents. These variables include the number of low-income households paying more than 30 percent of their income for housing, as well as severe overcrowding.

The future need for housing is determined primarily by the forecasted growth in households in a community, based on historical growth patterns, job creation, household formation rates, and other factors to estimate how many households will be added to each community over the projection period. The housing need for new households is then adjusted to account for an ideal level of vacancy needed to promote housing choice, maintain price competition and encourage acceptable levels of housing upkeep and repair. The RHNA also accounts for units expected to be lost due to demolition, natural disaster, or conversion to non-housing uses. The sum of these factors - household growth, vacancy need and replacement need - form the "construction need" assigned to each community. The City of Los Angeles was assigned a RHNA of 82,002 units for the 2014-2021 planning period.<sup>74</sup> There is no process for allocating the citywide total to City subareas, such as a Community Plan Area. Finally, the RHNA considers how each jurisdiction might grow in ways that will decrease the concentration of low-income households in certain communities. The need for new housing is distributed among income groups so that each community moves closer to the regional average income distribution.

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<sup>74</sup> *City of Los Angeles General Plan Housing Element, Housing Needs Assessment, December 3, 2013.*

### 2016-2040 Regional Transportation Plan

The 2016-2040 RTP/SCS includes a proposed growth forecast for population, household, and employment for the City of Los Angeles in 2012 and 2040:<sup>76</sup>

- Population: 3,845,500 persons in 2012 and 4,609,400 in 2040;
- Households: 1,325,500 households in 2012 and 1,690,300 in 2040; and
- Employment: 1,696,400 jobs in 2012 and 2,169,100 in 2040.

### *City*

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

The General Plan addresses community development goals and policies relative to the distribution of land use, both public and private, including housing. The General Plan integrates citywide elements, Community Plans, and Specific Plans and gives policy direction for planning regulations and implementation programs.

#### General Plan Framework Element

The General Plan Framework Element (General Plan Framework or Framework Element), adopted in December 1996 (re-adopted August 2001), is a strategy for long-term growth that sets a citywide context to guide the update of the Community Plans and citywide elements. The Framework Element provides that precise determinations regarding future growth and development will be made through the Community Planning process. The Framework Element encourages future growth and development within target areas, but does not require that future development and growth be limited to target areas. The Framework Element's central housing goal is an equitable distribution of housing opportunities by type and cost accessible to all residents of the City.

The General Plan Framework focuses on providing strategies for accommodating growth by encouraging growth in a number of higher-intensity commercial and mixed-use districts, centers, boulevards and industrial districts particularly in proximity to transportation corridors and transit stations. It is intended to be flexible and provides a Long Range Land Use Diagram recommending the creation of new land use categories for targeted growth areas in various areas of the City that will contain international centers,

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<sup>76</sup> SCAG, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Current Demographics and Forecast, Table 11, page 24.  
[http://scagrtpsc.net/Documents/2016/draft/d2016RTPSCS\\_DemographicsGrowthForecast.pdf](http://scagrtpsc.net/Documents/2016/draft/d2016RTPSCS_DemographicsGrowthForecast.pdf)

regional centers, community centers, neighborhood districts, and mixed-use boulevards based on the planning principles, goals, objectives, and policies it discusses.

#### General Plan Housing Element

The Housing Element of the City's General Plan identifies as its overall goal the creation of a city of livable and sustainable neighborhoods with a range of housing types and costs in mutual proximity to jobs, infrastructure and services.

On December 3, 2013, the City Council adopted the update to the Housing Element of the General Plan for the period of 2013-2021. The Housing Element provides the number of housing units each community must plan and accommodate during the 8-year period pursuant to the RHNA allocation. The Housing Element does not alter the development potential of any site in the City, nor modify land use of the Zoning Code. It also does not undermine, in any way, neighborhood planning efforts such as Community Plans, Specific Plans, or Historic Preservation Overlay Zones. While the State requires the City to evaluate and plan for the existing capacity to accommodate future projected growth, the Housing Element does not have any material effect on development patterns, nor specify areas for increased height or density.

An objective of the Housing Element is to promote an equitable distribution of affordable housing opportunities throughout the City by providing incentives to include affordable housing in residential development. The Project would further the goals and objectives of the Housing Element by providing additional housing stock.

#### **Existing and Forecasted Population and Housing for City of Los Angeles**

According to analysis by the State's Housing and Community Development Department, prior to the recent economic downturn and foreclosure crisis, California had experienced decades of undersupply of housing, contributing to significant price escalation and the affordability crisis.<sup>77</sup> The factors contributing to California's continuing housing supply and affordability problems include a chronic mismatch between the existing housing stock and the demand for housing by type and location; lack of sufficient housing construction to meet demand; and persistently high housing costs relative to household incomes, even with the effects of the recent national recession.

Almost all future California population and household growth will occur in metropolitan areas, and most of that will occur in southern California. According to SCAG's 2008 growth forecast, the six-county region is projected to add about 4.6 million people and about 1.6 million households between 2010 and

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<sup>77</sup> *State of California - Business, Transportation and Housing Agency, The State of Housing in California 2012: Affordability Worsens, Supply Problems Remain, 2012.*



2035. In Los Angeles County alone, the forecast envisions about 1.7 million people and about 646,000 households between 2010 and 2035. As the largest city in the County, the City of Los Angeles will receive most of the County's future growth.

SCAG's State-approved 5<sup>th</sup> Cycle 2014-2021 RHNA assigns 82,002 units of housing production need to the City of Los Angeles for the 2013-2021 Housing Element (which actually covers a 7.5-year planning period), or an annual average of about 15,000 new dwelling units per year.<sup>78</sup>

The Housing Element of the City's General Plan, mentioned above, notes that for over 10 years, the City has been pursuing a sustainable approach to accommodating long-range growth. This approach is established in the Framework Element of the General Plan, first adopted in 1995, which encourages sustainable growth in higher-intensity commercial and mixed-use districts, centers and boulevards, and in proximity to transit. The goals and policies of the Framework Element establish a balanced approach to growth by linking it to the land uses and infrastructure that will support the type of infill development that incurs the least economic, environmental, and social costs.

Table IV-25 lists the 2010 and 2016 population, households, and subsequent persons/housing ratio, the SCAG forecast for 2040, as well as the number and percent change.

**Table IV-25  
Population and Households in the City of Los Angeles**

Year	Population	Households	Person/Households
2010 <sup>1</sup>	3,792,621	1,412,006	2.69
2016 <sup>2</sup>	3,957,022	1,453,271	2.74
2040 <sup>4</sup>	4,609,400	1,690,300	2.72
<i>Change 2010 to 2016</i>			
Number Changed	+164,401	+41,265	+0.05
<i>Change 2016 to 2040</i>			
Number Changed	+652,378	+237,029	-0.02
<sup>1</sup> 2010: Census data, reported 4/1/2010. <sup>2</sup> 2016: As of January 1, 2016, Department of Finance: <a href="http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/">http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/</a> <sup>3</sup> 2020: Based on the adopted 2012-2035 RTP/SCS by SCAG, page 32: <a href="http://ripscs.scag.ca.gov/Documents/2012/final/SR/2012/RTP_GrowthForecast.pdf">http://ripscs.scag.ca.gov/Documents/2012/final/SR/2012/RTP_GrowthForecast.pdf</a> . <sup>4</sup> 2040: Based on the adopted 2016-2040 RTP/SCS by SCAG, page 24: <a href="http://scagrtpscs.net/Documents/2016/draft/d2016RTPSCS_DemographicsGrowthForecast.pdf">http://scagrtpscs.net/Documents/2016/draft/d2016RTPSCS_DemographicsGrowthForecast.pdf</a>			

<sup>78</sup> City of Los Angeles General Plan Housing Element, Housing Needs Assessment, December 3, 2013.

### Existing Project Site Conditions

The Project site is an infill site that is currently not developed with any structures.

### Project Impacts

The Project includes of the site with a 42 single-family homes. Based on the 2016 persons-per-household rate for the City shown on Table IV-25, the Project would generate approximately 114 residents.

As shown on Table IV-26, the Project would represent a negligible percent (less than one-half of one percent) of the estimated population and housing growth in the City. Thus, the Project's residents and housing units would fall within the estimates and RHNA allocation. Additionally, by utilizing the City's Small Lot Subdivision Ordinance for efficient single family home development, the Project would help achieve a portion of the household growth forecast for the City and the Northeast Los Angeles Community Plan area, while also being consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of VMT. Thus, the Project would not substantially induce housing growth beyond forecasted levels and would meet a portion of forecasted housing demand currently forecasted for the City. Thus, the Project would not represent a substantial or significant growth as compared to projected growth. Therefore, no significant impacts related to population and housing would occur as a result of the Project.

**Table IV-26  
Project Estimated Comparison**

Project	Comparison Amount	% of Comparison
<b>As compared to Growth Forecast from 2016 to 2040</b>		
114 residents	+652,378 <sup>1</sup>	0.017
42 units	+237,029 <sup>1</sup>	0.017
<b>As compared to City's 2014-2021 Housing Element</b>		
42 units	6,018 (Community Plan) <sup>2</sup>	0.69
42 units	82,002 (Citywide) <sup>3</sup>	0.05
<sup>1</sup> Refer to Table IV-25		
<sup>2</sup> City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, Table 3.1, page 3-4.		
<sup>3</sup> City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, page 3-3.		

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

**No Impact.** No housing exists on the Project site. Therefore, the Project would not displace any existing housing, necessitating the construction of replacement housing elsewhere, and no impacts related to this issue would occur.

**c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?**

**No Impact.** No people live on the Project site. Therefore, the Project would not displace any residents, necessitating the construction of replacement housing elsewhere, and no impacts related to this issue would occur.

**Cumulative Impacts**

Implementation of the related projects listed on Table IV-38 could result in housing and population growth. However, as discussed previously, the Project's population growth would be consistent with the anticipated growth for the Project area and in the General Plan. The Project would not create unplanned growth, and impacts related to population and housing would be less than significant. As such, regardless of whether the related projects would result in unplanned growth, the Project would not have the potential to contribute to any potential cumulative impact.

## **14. PUBLIC SERVICES**

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

**(i) Fire protection?**

**Less Than Significant Impact.** The Project includes development of a 42 single-family residential homes at the Project site, increasing the need for fire protection services at the Project site. Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project: (1) is within the maximum response distance for the land uses proposed; (2) complies with emergency access requirements; (3) complies with fire-flow requirements; and (4) complies with fire hydrant placement. Pursuant to LAMC Section 57.09.07, the maximum response distance between a low-density residential neighborhood land use and a LAFD station that houses an engine or truck company is 1.5 miles. If this distance is exceeded, all structures shall be constructed with automatic fire sprinkler systems.<sup>79</sup> However, projects that fall within Very High Fire Hazard Severity Zone (as is the Project) are required to install fire sprinkler systems.

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<sup>79</sup> LAFD website: [http://lafd.com/prevention/hydrants/division\\_9\\_fc.html](http://lafd.com/prevention/hydrants/division_9_fc.html), accessed October 21, 2014.

The Project site is served by several fire stations, as shown on Table IV-27. As stated previously, the Project is located within a Very High Fire Hazard Severity Zone. Thus, the Project would be required to be designed and constructed in accordance with the Los Angeles Fire Code and would be required to incorporate measures, including but not limited the following:

- Ignition-resistant roofing and other building materials
- Fire-Retardant-Treated Wood or noncombustible materials
- Roof coverings, valleys, and gutters
- Attic ventilation
- Eave or cornice vents
- Sprinkler systems
- Landscaping with fire-retardant plants
- Vegetation clearance

Additionally, prior to issuance of an Occupancy Permit, the Project Applicant would be required to coordinate with LAFD to ensure that the Project incorporates all appropriate fire-prevention measures. All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department and LAFD standards and requirements for design and construction. Therefore, the Project would not result in any significant impacts related to emergency access. Approximate fire-flow requirement for the Project is 2,000 gallons per minute with a 20 pounds-per-inch residual pressure. Final fire-flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project during LAFD's plan check process. Through compliance with these requirements, Project impacts related to fire protection services would be less than significant.

**Table IV-27**  
**Fire Stations Serving the Project Site**

No.	Address	Distance from Project Site
1	2230 Pasadena Avenue	3.8 miles
12	5921 North Figueroa Street	3.4 miles
16	2011 North Eastern Avenue	0.7 mile
47	4575 Huntington Drive South	1.2 miles

*Source: [http://lafd.org/fire\\_stations/station\\_results/%2A?zipcode=90065](http://lafd.org/fire_stations/station_results/%2A?zipcode=90065), accessed April 15, 2015.*

### Cumulative Impacts

Implementation of the related projects on Table IV-38 could result in a net increase in the number of residents and employees in the Project area and could further increase the demand for fire protection services. Cumulative development requires the LAFD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the proposed Project, the related projects would be subject to the Fire Code and other applicable regulations of the LAMC

including, but not limited to, automatic fire sprinkler systems for high-rise buildings and/or residential projects located farther than 1.5 miles from the nearest LAFD Engine or Truck Company to compensate for additional response time, and other recommendations made by the LAFD to ensure fire protection safety. Through the process of compliance, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAFD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and related projects would contribute. Therefore, cumulative impacts related to fire protection services would be less than significant.

**(ii) Police protection?**

**Less Than Significant Impact.** The Project includes development of 42 single-family residential homes at the Project site, increasing the need for police protection services at the Project site. In accordance with the City's Standard Condition of Approval, the Project developer would be required to refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the LAPD. Contact the Community Relations Division, located at 100 W. 1<sup>st</sup> Street, #250, Los Angeles, CA 90012; (213) 486-6000. The Project would include standard security measures such as adequate security lighting, controlled residential access, and secure parking facilities. These measures for the Project shall be approved by the LAPD prior to the issuance of building permits. Through compliance with the requirements of the LAPD, Project impacts related to police protection services would be less than significant.

**Cumulative Impacts**

Implementation of the related projects listed on Table IV-38 could result in a net increase in the number of residents and employees in the Project area and could further increase the demand for police protection services. Cumulative development requires the LAPD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the proposed Project, the related projects would be subject to the site plan review, recommendations of the LAPD related to crime prevention features, and other applicable regulations of the LAMC. Through the process of compliance, the ability of the LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and related projects would contribute. Therefore, cumulative impacts related to police protection services would be less than significant.

**(iii) Schools?**

**Less Than Significant Impact.** Los Angeles Unified School District's (LAUSD) schools that serve the Project site and area are shown on Table IV-28. As shown on Table IV-29, the Project would generate a total of approximately 11 students, including 5 elementary students, 3 middle school students, and 3 high

school students. Based on the remaining capacity shown on Table IV-28, the schools serving the Project site would have adequate capacity to serve the Project's student generation. Pursuant to the California Government Code, mandatory payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Additionally, the Project Applicant would be required to implement Mitigation Measures 16-2 and 16-4 (refer to Checklist Question 16a, Transportation/Traffic) to ensure that construction-related traffic would not cause any safety issues for Farmdale Elementary School and El Sereno Middle School located near the Project site. Therefore, Project impacts to school services would be less than significant.

### Cumulative Impacts

The related projects listed on Table IV-38 could result in an increase in the number students in the Project area. However, similar to the applicant of the proposed Project, the applicants of all the related projects would be required to pay the applicable school fees to the LAUSD to ensure that no significant impacts to school services would occur. Therefore, cumulative impacts to school services would be less than significant.

**Table IV-28**  
**LAUSD School's Serving the Project Area Student Capacity and Enrollment**

School Type (Grade)	School Name	Capacity (students)	Actual Enrollment (students)	(-)Under / (+)Over Capacity (students)
Elementary School	Farmdale Elementary School	546	501	-45
Middle School	El Sereno Middle School	1,568	1,304	-264
High Schools	Lincoln Senior High School	1,702	1,365	-337
	Wilson Senior High School	2,077	1,748	-329

*Source: LAUSD, Rena Perez, Director, March 9, 2015 (refer to Appendix H).*

**Table IV-29  
Estimated Project Student Generation**

Use Type	Amount of Development	School Type	Student Generation Factor*	Total Students Generated
Residential	42 du	Elementary School (K-5)	0.1266/du	5
		Middle School (6-8)	0.0692/du	3
		High School (9-12)	0.0659/du	3
<b>Total</b>				<b>11</b>

*du = dwelling unit      Number of students has been rounded to the nearest whole number.*  
*\* Los Angeles Unified School District, Student Generation Rate Calculation, February 25, 2008.*

**(iv) Parks?**

**Less Than Significant Impact.** The Project would consist of 42 single-family residential homes, which would generate an estimated 114 residents. The standard minimum parkland-to-population ratio, provided in the City's General Plan Framework Element, is two acres of parkland per 1,000 residents generated. Therefore, implementation of the Project would require approximately 0.228 acre of parkland.<sup>90</sup> However, the Project Applicant shall pay all required parkland (i.e., Quimby) fees pursuant to the LAMC, including, in consultation with the City of Los Angeles Department of Recreation and Parks, the Project Applicant shall be required to comply with one or more of the following: 1) dedicate two acres of parkland per 1,000 residents, 2) pay in-lieu fees for any land dedication requirement shortfall, or 3) provide on-site improvements equivalent in value of the in-lieu fees, or any portion thereof. Through compliance with the LAMC, Project impacts related to parks and recreational facilities would be less than significant.

**Cumulative Impacts**

The related projects listed on Table IV-38 could result in an increase demand for parks and recreational services. However, employees generated by the commercial projects and the commercial portions of mixed-use projects on the related projects list would not typically enjoy long periods of time during the workday to visit parks and/or recreational facilities. Therefore these related-project-generated employees would not contribute to the future demand on park and recreational facility services. The extent to which the related residential projects include parks/recreational amenities is unknown. However, the applicants of these projects would be subject to the parkland fees pursuant to LAMC Section 17.12, ensuring that

<sup>90</sup>  $\{(114 \text{ residents}) \div (1,000)\} = 0.114 \text{ thousand residents. } \{(2 \text{ acres of parkland}) \times (0.114 \text{ thousand residents})\} = 0.228 \text{ required acre.}$

any potential impacts to parks and recreational facilities would be less than significant, similar to the proposed Project. As stated previously, Project impacts related to parks and recreational facilities would be less than significant. Therefore, cumulative impacts to park and recreational facilities would be less than significant.

(v) **Other public facilities?**

**Libraries**

**Less Than Significant Impact.** The City of Los Angeles Public Library (LAPL) provides library services throughout the City. The LAPL's Branch Facilities Plan includes criteria for new libraries and recommends new size standards for the provision of LAPL facilities: 12,500 square feet for communities with a population of less than 45,000; 14,500 square feet for communities with a population of more than 45,000; and up to 20,000 square feet for a regional branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the community.

As discussed previously, the Project would introduce approximately 114 residents to the Project site. (It should be noted that some or all of the 114 residents could already live in the Project area or City with an existing demand for library services that would not be increased with implementation of the Project.) However, the number of residents generated by the Project is minimal and would not require the need for new or expanded library facilities. Therefore, Project impacts to library service would be less than significant.

**Cumulative Impacts**

Implementation of the related projects listed on Table IV-38 could increase the demand for library services in the Project area. The related residential projects would be subject to the standards to determine demand for library facilities used by the City, and would likely be required to implement mitigation where applicable. As such, the demand for library services created by these residential projects could be accommodated, and impacts would be less than significant. As stated previously, Project impacts related to library services would be less than significant. Therefore, cumulative impacts to library services would be less than significant.

## 15. RECREATION

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

**Less Than Significant Impact.** As discussed above in response to Checklist Question 14iv (Parks), the Project Applicant would be required to either dedicated approximately 0.228 acre of parkland, pay in-lieu fees, or provide on-site improvements equivalent in value to in-lieu fees (or any portion thereof). The



Project would not cause substantial deterioration of parks and recreational facilities. Therefore, impacts related to this issue would be less than significant.

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

**Less Than Significant Impact.** Refer to response to Checklist Question 14(a)(iv).

#### **Cumulative Impacts**

Refer to discussion of cumulative impacts related to parks and recreational facilities under response to Checklist Question 14(a)(iv).

## **16. TRANSPORTATION AND TRAFFIC**

a) **Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

**Less Than Significant With Mitigation Incorporated.** The analysis and information in this section is primarily based on the Traffic Impact Study for El Sereno – VTTM 73531 (2520-2608) N. Eastern Avenue) Los Angeles, California, prepared by KOA Corporation and dated November 11, 2016 (refer to Appendix I).

#### **Project Study Area**

The study area included the following signalized study intersections:

1. Eastern Avenue/El Sereno Avenue and Huntington Drive
2. Eastern Avenue and Lombardy Boulevard
3. Eastern Avenue and Klamath Street
4. Eastern Avenue and Valley Boulevard

Figure IV-2 illustrates the locations of the four study intersections and the Project site.

#### **Methodologies**

Based on LADOT's current traffic study policies, this study uses the Critical Movement Analysis (CMA) methodology for the analysis and evaluation of traffic operations at signalized intersections under their

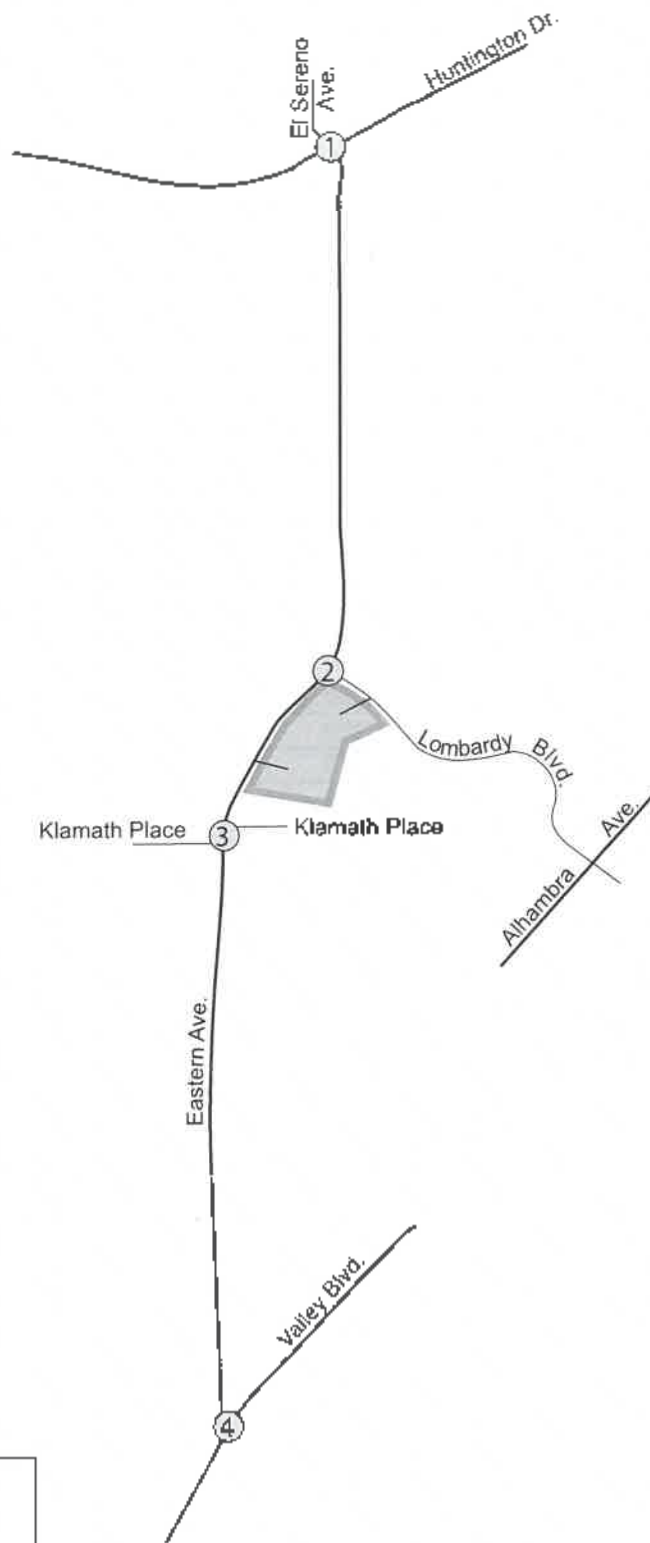
jurisdiction, as detailed in Circular Number 212 published by the Transportation Research Board (TRB).<sup>81</sup> This analysis technique describes the operating characteristics of an intersection in terms of the "Level of Service" (LOS) based on intersection traffic volume and other variables such as number and type of signal phasing, lane geometries, and other factors which determine both the quantity of traffic that can move through an intersection (Capacity) and the quality of that traffic flow (LOS).

"Capacity" represents the maximum total hourly volume of vehicles in the critical lanes that has a reasonable expectation of passing through an intersection under prevailing roadway and traffic conditions. Critical lanes are defined generally as those intersection movements or groups of movements which exhibit the highest "per lane" volumes, thus defining the maximum amount of vehicles attempting to travel through the intersection during a specific time period. The capacity of an intersection also varies based on the number of signal phases for the location; more signal phases generally result in more "lost" or "startup" time, as drivers exhibit slight reaction delays when signal indications change from "red" to "green." For the CMA analysis methodology, the intersection capacities associated with the various levels of service are therefore based on the number of traffic signal phases, as shown on Table IV-30.



For the intersection evaluation and transportation planning purposes of this traffic study, LADOT policy requires that the maximum "baseline" capacity of an intersection equate to the value associated with LOS E shown on Table IV-30. This value represents the highest volume of traffic that can be adequately accommodated through urban area intersections without a breakdown in operations, resulting in unstable traffic flows, high levels of congestion, and long delays.

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<sup>81</sup> *Interim Materials on Highway Capacity, Circular Number 212, Transportation Research Board, Washington, D.C., 1980.*



**LEGEND**

-  Project Location
-  Study Intersections

Source: KOA Corporation Planning & Engineering, 2016.



The "Critical Movement" indices at an intersection are determined by first identifying the sum of the critical lane traffic volumes at the intersection. This total traffic volume value, which represents the most critical intersection demand, is then divided by the appropriate intersection capacity value for the type of signal control at the intersection, to determine the "CMA value" for the intersection that is roughly equivalent to its volume-to-capacity ratio.

**Table IV-30**  
**CMA Volume Ranges per LOS\***

LOS	Maximum Sum of Critical Volumes (VPH) vs. Number of Signal Phases		
	Two Phases	Three Phases	For or More Phases
A	900	855	825
B	1,050	1,000	965
C	1,200	1,140	1,100
D	1,350	1,275	1,225
E	1,500	1,425	1,375
F	NA	NA	NA

\* For planning applications only. Not appropriate for operations/design applications

LOS describes the quality of traffic flow through the intersection. LOS A through LOS C exhibit good traffic flow characteristics, with little congestion. LOS D is typically the level for which metropolitan area street systems are designated, and represents the highest level of acceptable congestion and delay. LOS E defines conditions at or near the capacity of an intersection, and is characterized by short-duration stoppages and unstable traffic flows at its upper range. LOS F occurs when a facility is overloaded, and is characterized by stop-and-go traffic with long duration delays. Note that the LOS definitions do not represent a single operating condition, but rather correspond to a range of CMA values, as shown on Table IV-31.

**Table IV-31  
LOS Definitions for Signalized Intersections (CMA Method)**

LOS	Intersection Capacity Utilization	Definition
A	0.000 - 0.600	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	0.601 - 0.700	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.701 - 0.800	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801 - 0.900	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	0.901 - 1.000	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several cycles.
F	> 1.000	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

*Source: Transportation Research Board, Transportation Research Circular No. 212, Interim Materials on Highway Capacity, 1980.*

## Existing Conditions

### Roadway System

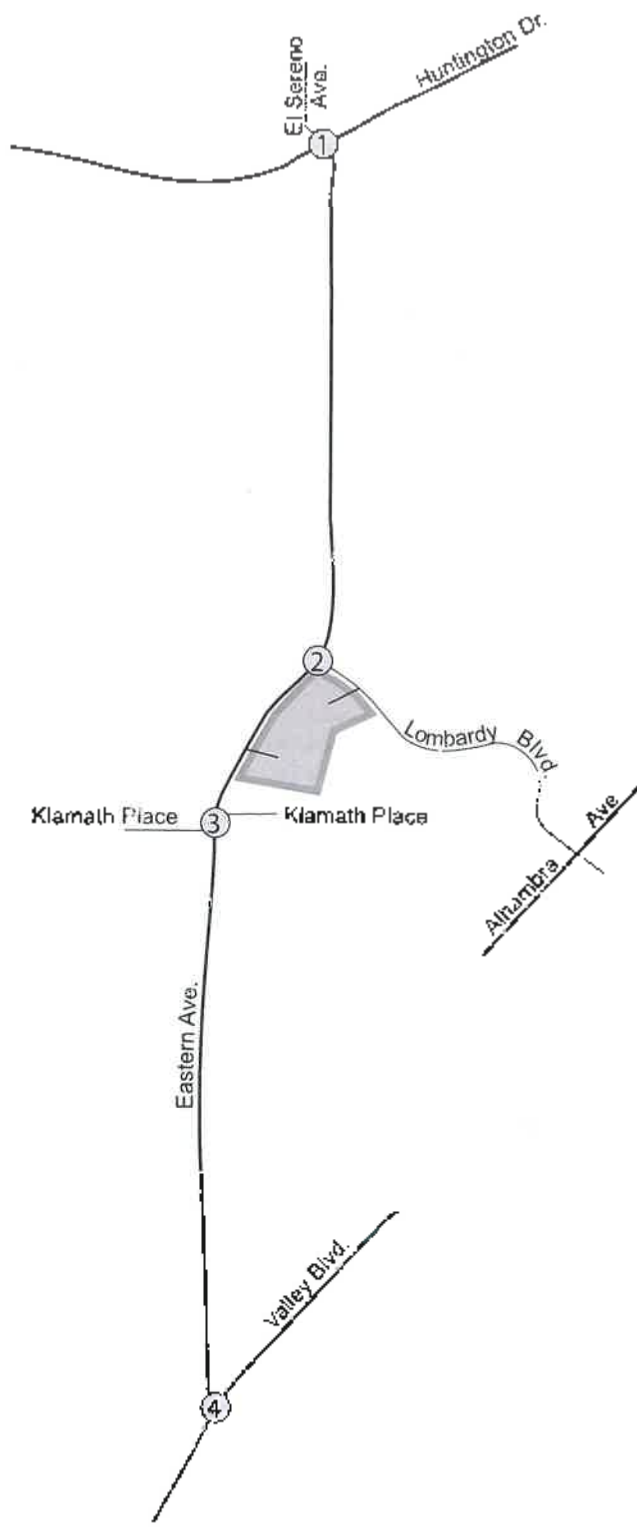
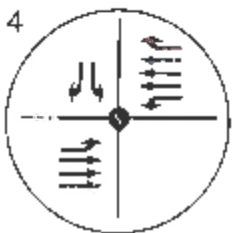
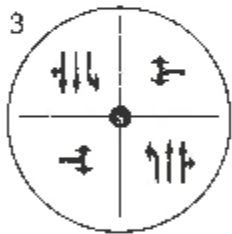
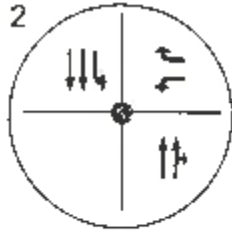
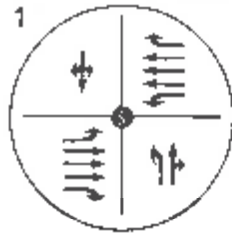
Figure IV-3 illustrates the existing traffic controls and approach lane geometries at the study intersections. The key roadways within the study area are described on Table IV-32.

### Existing Transit





Table IV-33 provides a description of the bus transit lines that operate within the study area. The existing transit lines are illustrated on Figure IV-4.

### Existing Traffic Volumes

Study intersection counts including vehicle, pedestrian and bicycle volumes were collected at the study intersections on Tuesday, October 25, 2016 and Tuesday, November 8, 2016 from 7:00 AM to 10:00 AM and from 2:00 PM to 5:00 PM. The highest four consecutive 15-minute vehicle counts during the two time periods were used to determine the peak hour traffic volumes at each intersection. The existing weekday AM peak hour and PM peak hour traffic turn movement volumes are shown on Figures IV-5 and IV-6, respectively.



**LEGEND**

-  Project Location
-  Study Intersection
-  Signalized Intersection
-  Intersection Lane Geometry

Source: KDA Corporation Planning & Engineering, 2016.

  
 Not to Scale

**Table IV-32  
Study Area Roadway Descriptions**

Segment	# Lanes		Median Type	Parking Restrictions		General Land Use	Posted Speed Limit (mph)
	NB/EB	SB/WB		North Side/ East Side	South Side/ West Side		
<b>EASTERN AVENUE</b>							
Huntington Dr. to Gambler St.	2	2	Striped	1 hr. 8am-6pm	1 hr. 8am-6pm	Commercial	35
Gambler St. to Lombardy Blvd.	2	2	Striped	Parking Permitted	15 min. 7am-5pm & NS 7am-5pm School Days	School/Residential	35
Lombardy Blvd to Klamath St.	2	2	Striped, TWLT	NSAT	NP 7am-5pm School days; NSAT	School/Open Space	35
Klamath St. to Druid St.	2	2	Striped	Parking Permitted	Parking Permitted	Church/Residential	35
Druid St. to Valley Blvd.	2	2	Striped	Parking Permitted	Parking Permitted	Residential	35
<b>EL SERENO AVENUE</b>							
North of Huntington Dr.	1	1	Not Striped	NP 8am-10am Friday	NP 8am-10am Thursday	Residential	Not Posted
<b>HUNTINGTON DRIVE</b>							
West of Eastern Ave.	3	3	Raised	Parking Permitted, No Parking	Parking Permitted, No Parking	Commercial	35
East of Eastern Ave.	3	3	Raised	1 hr. 8am-6pm	1 hr. 8am-6pm	Commercial	35
<b>LOMBARDY BOULEVARD</b>							
East of Eastern Ave.	1	1	Striped	Parking Permitted	Parking Permitted	Residential	Not Posted
West of Alhambra Ave.	1	1	Not Striped	Parking Permitted	Parking Permitted	Residential	Not Posted
East of Alhambra Ave.	1	1	Not Striped	Parking Permitted	Parking Permitted	Residential	Not Posted
<b>KLAMATH PLACE</b>							
West of Eastern Ave.	1	1	Not Striped	Parking Permitted	Parking Permitted	Residential	Not Posted
East of Eastern Ave.	1	1	Not Striped	Parking Permitted	Parking Permitted	Residential	Not Posted
<b>VALLEY BOULEVARD</b>							
West of Eastern Ave.	3	3	Striped	No Stopping 7am-9am	No Stopping 4pm-7pm	Light Industrial	30
East of Eastern Ave.	3	3	Striped	NSAT	NSAT	Light Industrial	Not Posted
<i>NS = no stopping      NSAT = no stopping anytime    NP = no parking      TWLT = two-way left turn</i>							
<i>Source: KOA Corporation, 2016.</i>							

**Table IV-33**  
**Existing Transit Service Summary**

Agency	Line	From	To	Via	Approx. Peak Frequency
Metro	76	Los Angeles	El Monte	Valley Boulevard	12-15 minutes
Metro	78	Los Angeles	Arcadia	Huntington Drive	6-20 minutes
Metro	79	Los Angeles	Arcadia	Huntington Drive	15-30 minutes
Metro	378	Los Angeles	Arcadia	Huntington Drive	11-28 minutes
Metro	256	Commerce	Altadena	Eastern Avenue & Valley Boulevard	45 minutes
LADOT	DASH	El Sereno/City of Terrace		Eastern Avenue Druid Street Lombardy Boulevard Alhambra Avenue	15-25minutes

*Source: KOA Corporation, 2016*

#### **Existing Traffic Signal System**

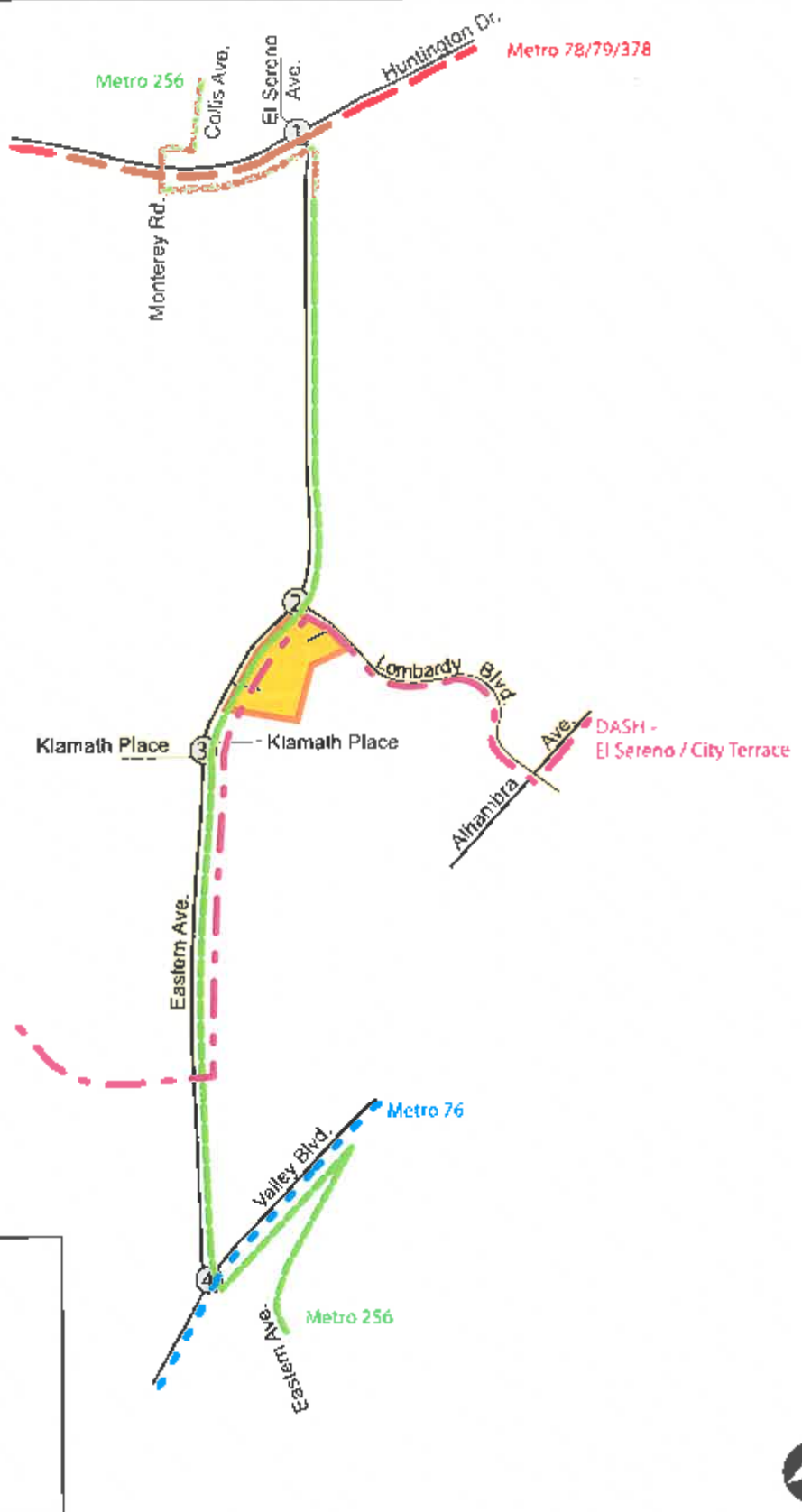
Automated Traffic Surveillance And Control (ATSAC) is a computer-based traffic signal control system whereby engineers monitor traffic conditions and system performance, selects appropriate signal timing (control) strategies, and performs equipment diagnostics and alert functions. Sensors in the street detect the passage of vehicles, vehicle speed, and the level of congestion. This information is received on a second-by-second (real-time) basis and is analyzed on a minute-by-minute basis at the ATSAC Operations Center to determine if better traffic flow can be achieved by changing the signal timing. If required, the signal timing is either automatically changed by the ATSAC computers or manually changed by the operator using communication lines that connect the ATSAC Center with each traffic signal. To supplement the information from electronic detectors, closed-circuit television (CCTV) surveillance equipment has been and continues to be installed at critical locations throughout the City.

Adaptive Traffic Control System (ATCS) is the latest enhancement to ATSAC that provides fully traffic adaptive signal control based on real-time traffic conditions. The ATCS will automatically adjust traffic signal timing in response to current traffic demands by allowing ATCS to simultaneously control all three critical components of traffic signal timing, namely cycle length, phase split and offset.

For capacity analysis, LADOT guidelines suggest a 0.07 reduction in volume-to-capacity ratio with the implementation of ATSAC and a 0.03 reduction with the implementation of ATCS, for an overall volume-to-capacity reduction of 0.10. This reduction represents field-measured benefits in flow and capacity increase by operation of this program.

Based on information obtained from LADOT, all of the study intersections are currently equipped with ATSAC/ATCS and is subjected to an overall volume-to-capacity reduction of 0.1 for both existing and future conditions to reflect the ATSAC and ATCS enhancements.

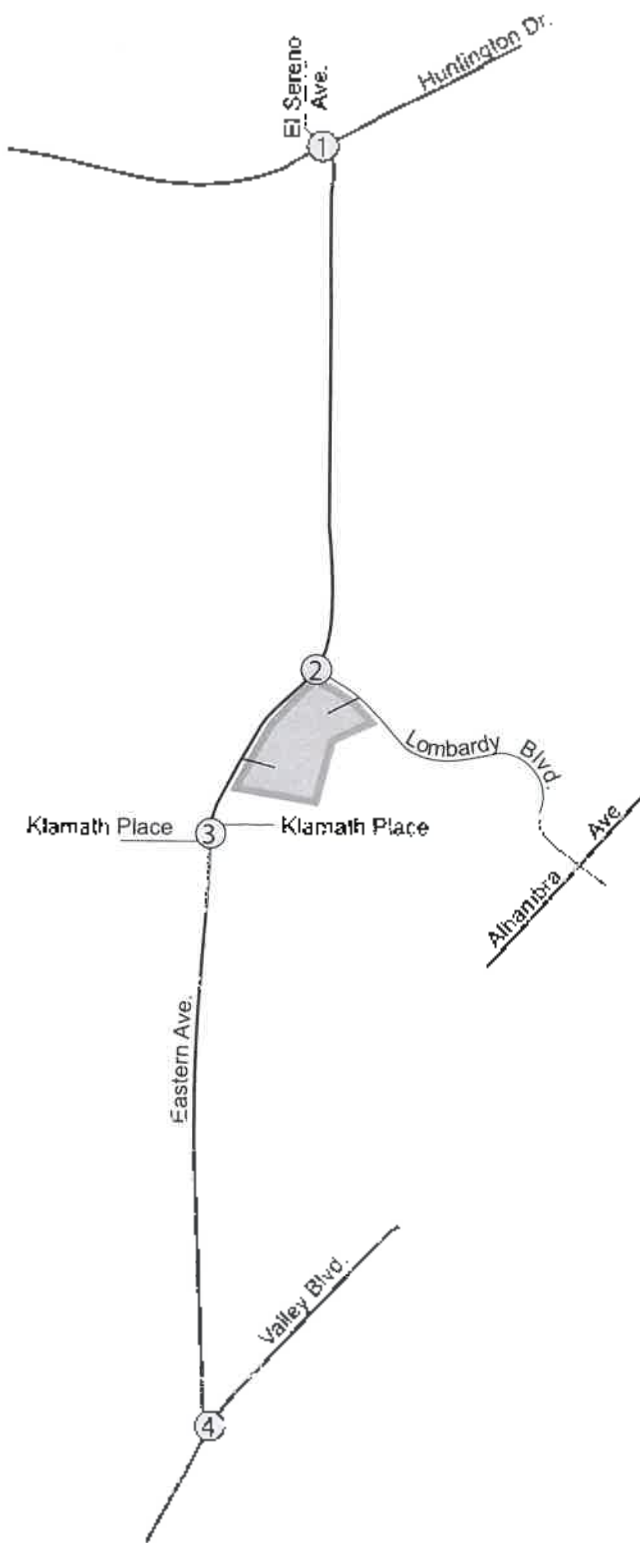
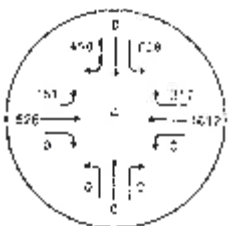
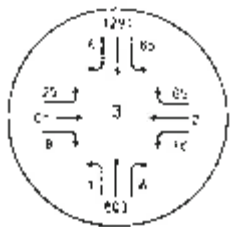
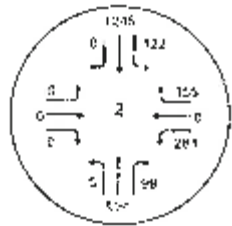
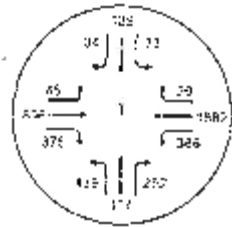







Source: KOA Corporation Planning & Engineering, 2016.



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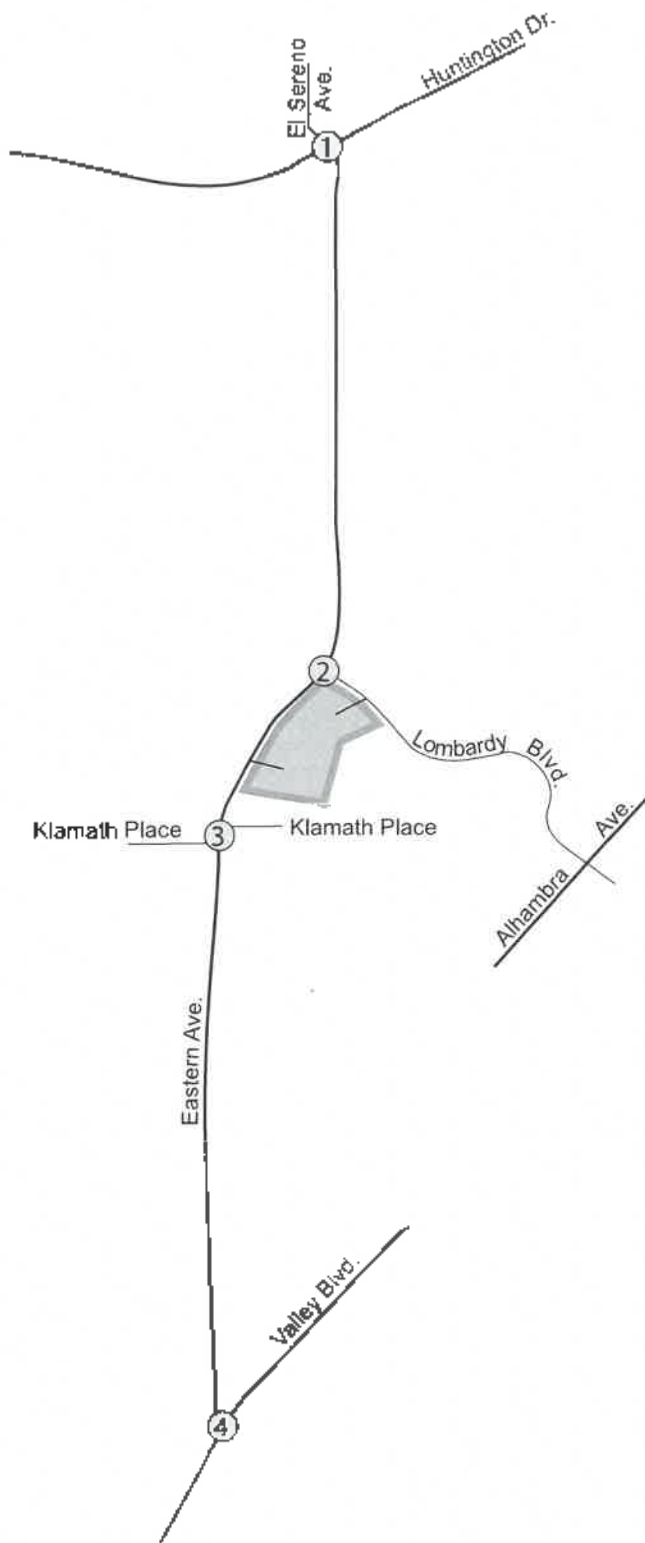
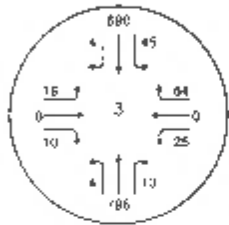
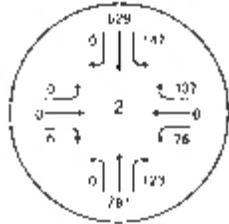
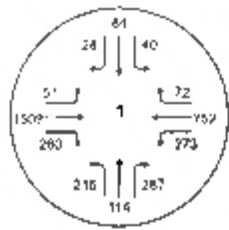
**LEGEND**

-  Project Location
-  Study Intersections
-  Intersection Volumes

Source: KOA Corporation Planning & Engineering, 2016.



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**LEGEND**

- Project Location
- Study Intersections
- Intersection Volumes

Source: KOA Corporation Planning & Engineering, 2016.



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### Existing Intersection Levels of Service

Based on the intersection lane geometries depicted on Figure IV-3 and the existing traffic volumes shown on Figures IV-5 and IV-6, volume-to-capacity (V/C) ratios and corresponding levels of service (LOS) were determined for each of the study intersections during both weekday AM and PM peak hours. Table IV-34 summarizes the volume-to-capacity ratios and LOS values for existing traffic conditions. As shown in this table, all of the study intersections are currently operating at a good level of service (LOS D or better) during the weekday AM and PM peak hours.

### Threshold of Significance

LADOT's significance criteria for determining intersection LOS impacts are shown on Table IV-35.

**Table IV-34**  
Existing LOS

Study Intersection		AM Peak Hour		PM Peak Hour	
		V/C	LOS	V/C	LOS
1	Eastern Ave./El Sereno Ave. & Huntington Dr.	0.727	C	0.785	C
2	Eastern Ave. & Lomhardy Boulevard	0.534	A	0.374	A
3	Eastern Ave. & Klamath St	0.401	A	0.270	A
4	Eastern Ave. & Valley Blvd.	0.824	D	0.435	A

*Source: KOA Corporation, 2016*

**Table IV-35**  
LADOT Intersection Significance Thresholds

Intersection Conditions with Project Traffic		Project-related Increase in V/C Ratio
LOS	V/C	
C	0.701 - 0.800	Equal to or greater than 0.04
D	0.801 - 0.900	Equal to or greater than 0.02
E, F	> 0.900	Equal to or greater than 0.01

*Source: LADOT.*

### Project Impacts

#### Project Trip Generation

Trip generation for the Project was calculated by using rates published in ITE's *Trip Generation, 9<sup>th</sup> Edition*. The trip rates and the associated trip generation forecasts are shown on Table IV-36. As shown, the Project would generate approximately 400 daily weekday vehicle trips, including 32 trips (8 inbound

trips and 24 outbound trips) during the AM peak hour and 42 trips (26 inbound trips and 16 outbound trips) during the PM peak hour.

**Table IV-36**  
**Project Trip Generation**

Land Use	ITE Code	Intensity	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
<i>Trip Generation Rates</i>									
Single-family Detached Housing	21	1 unit	9.52	25%	75%	0.75	63%	37%	1.00
<i>Project Trips</i>									
Single-Family Detached Housing	210	42 units	400	8	24	32	26	16	42
<i>Source: KOA Corporation, 2016</i>									

#### ***Project Trip Distribution***

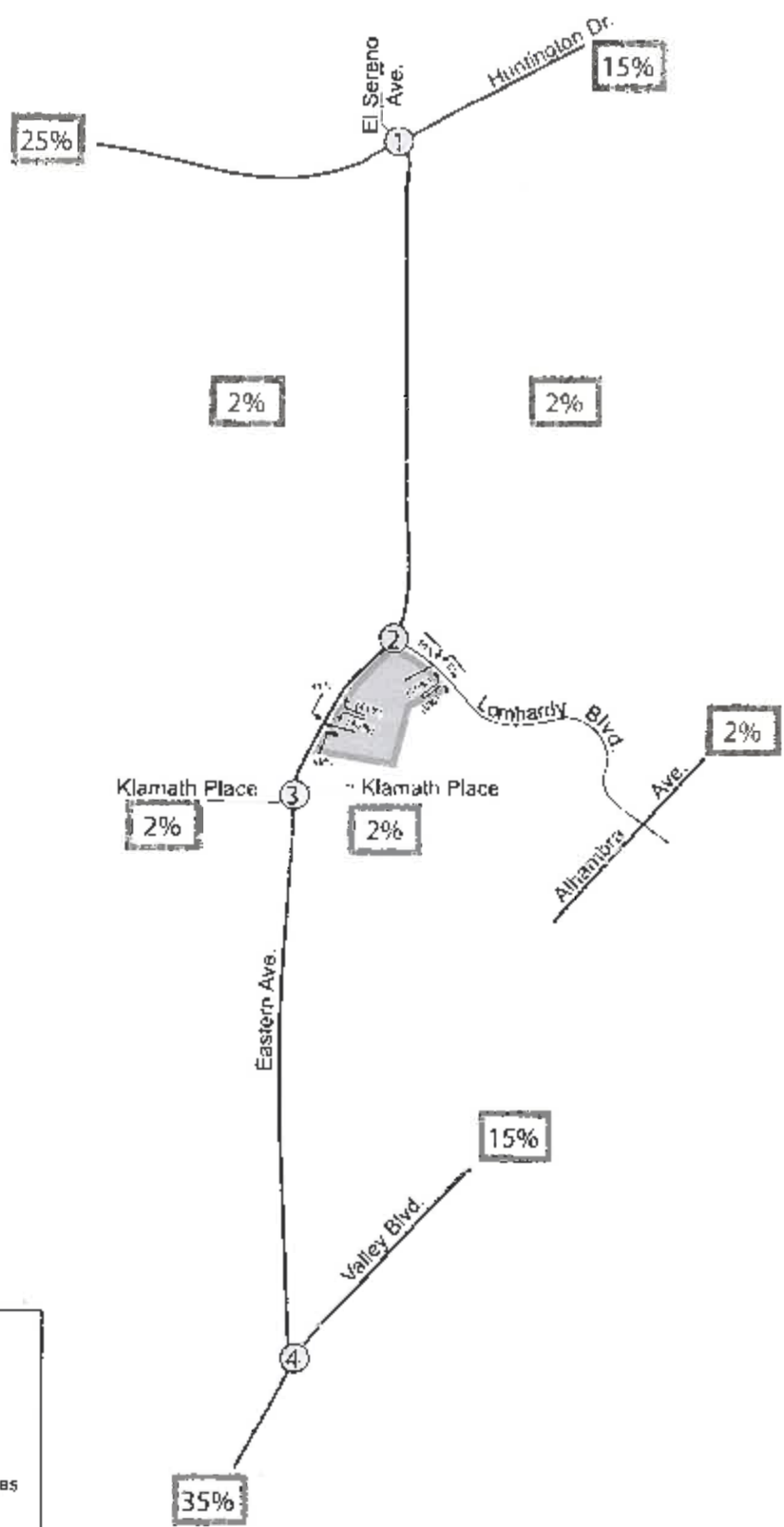
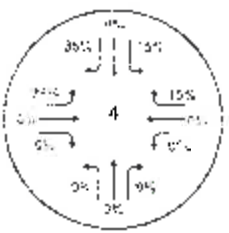
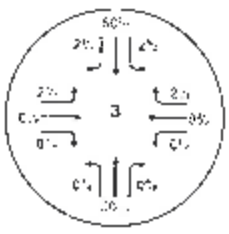
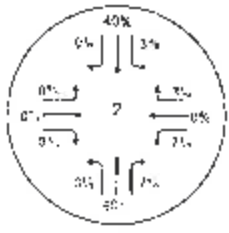
Trip distribution is the process of assigning the directions from which traffic will access a project site. Trip distribution is dependent upon the land use characteristics of the project, the local roadway network, and the general locations of other land uses to which project trips would originate or terminate. Figure IV-7 illustrates the trip distribution percentages at the study intersections that were used for the traffic impact analysis.

#### ***Project Trip Assignment***

Based on the trip generation and distribution assumptions described above, project traffic was assigned to the roadway system based on site driveway locations. Figures IV-8 and IV-9 illustrate the Project trips for the weekday AM and PM peak hours, respectively.

#### ***Existing Plus Project Conditions***

This section documents existing traffic conditions at the study intersections with the addition of Project-generated traffic. Traffic volumes for these conditions were derived by adding Project trips to the existing traffic volumes. The Existing Plus Project traffic volumes are provided on Figure IV-10 for the AM peak hour and on Figure IV-11 for the PM peak hour. Table IV-37 summarizes the resulting V/C and LOS values at the study intersections for the Existing Plus Project conditions. As shown, the Project would not result in any significant LOS impacts at any of the study intersections. Therefore, Project impacts under the Existing Plus Project traffic conditions would be less than significant.

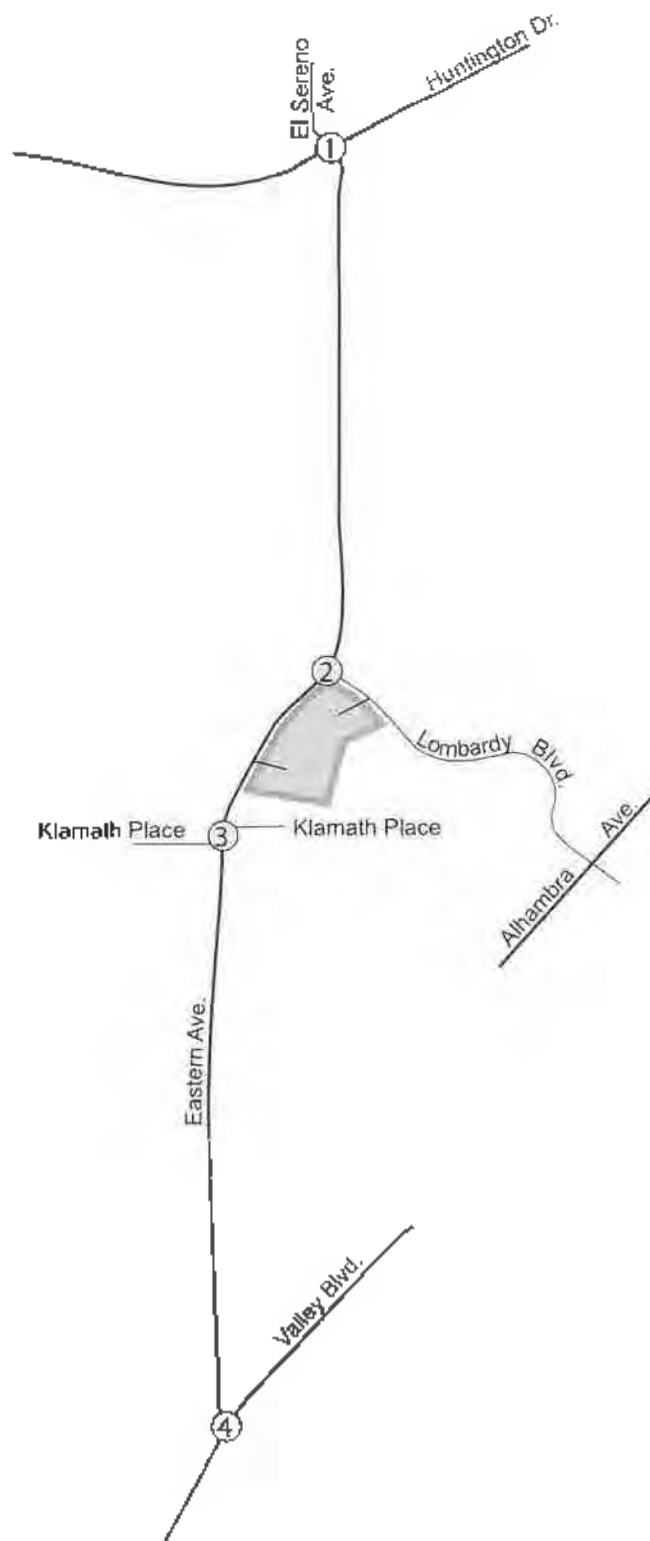
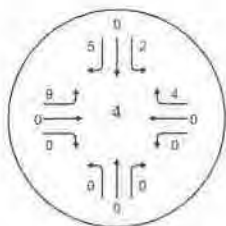
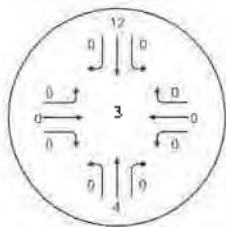
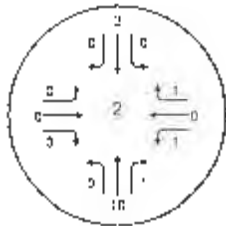
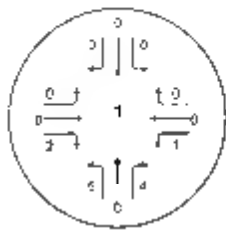


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
- Project Location
- Study Intersections
- Project Distribution Trip Percentages
- Project Trip Distribution Percentage

Source: KOA Corporation Planning & Engineering, 2016.

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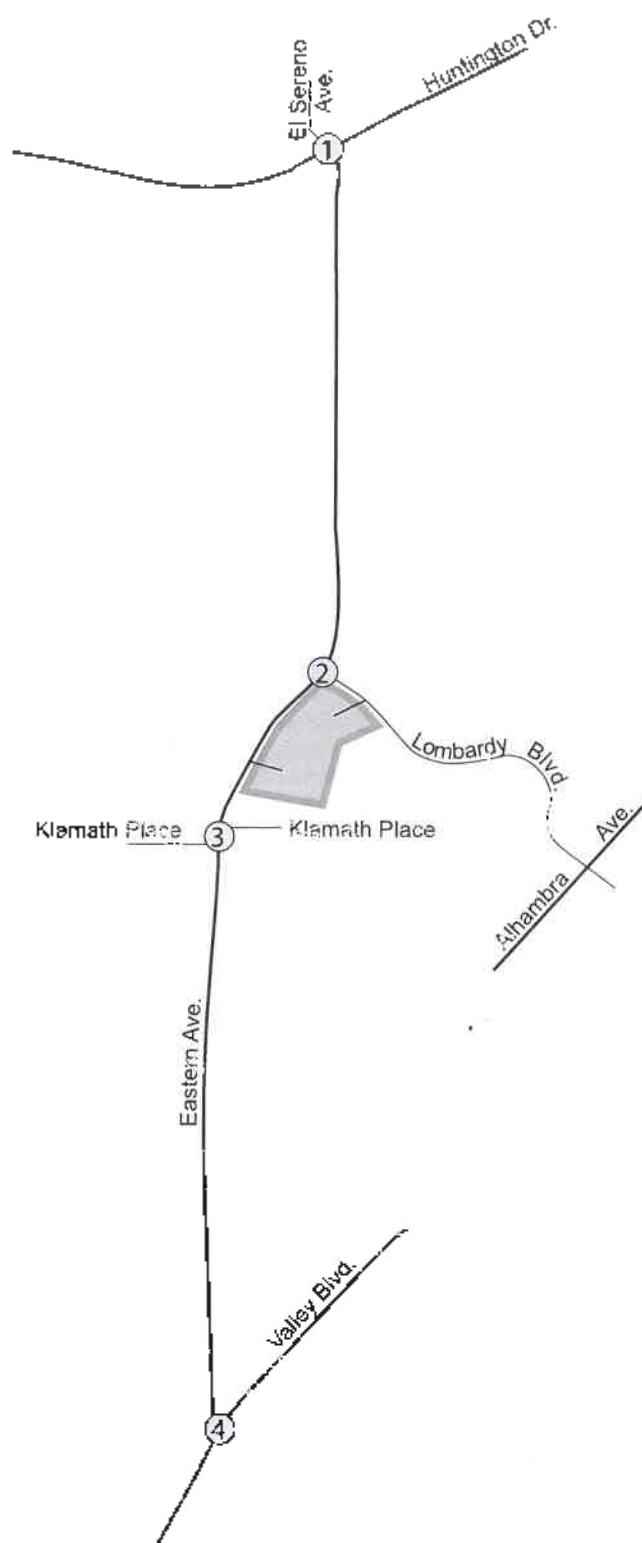
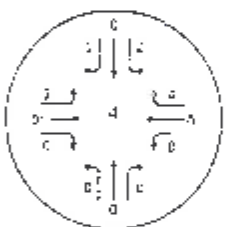
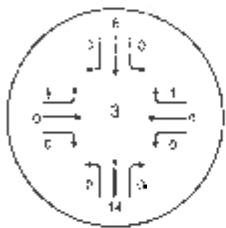
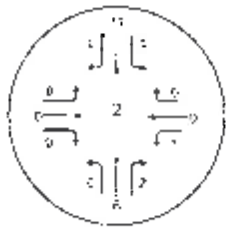
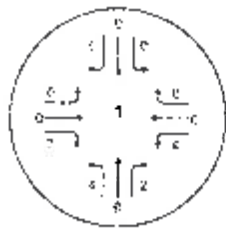
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-  Project Location
-  Study Intersections
-  Intersection Volumes




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**LEGEND**

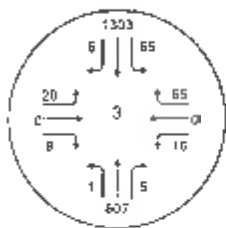
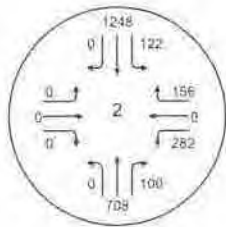
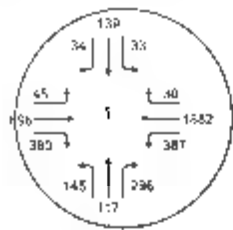
-  Project Location
-  Study Intersections
-  Intersection Volumes

Source: KOA Corporation Planning & Engineering, 2016.



Not to Scale





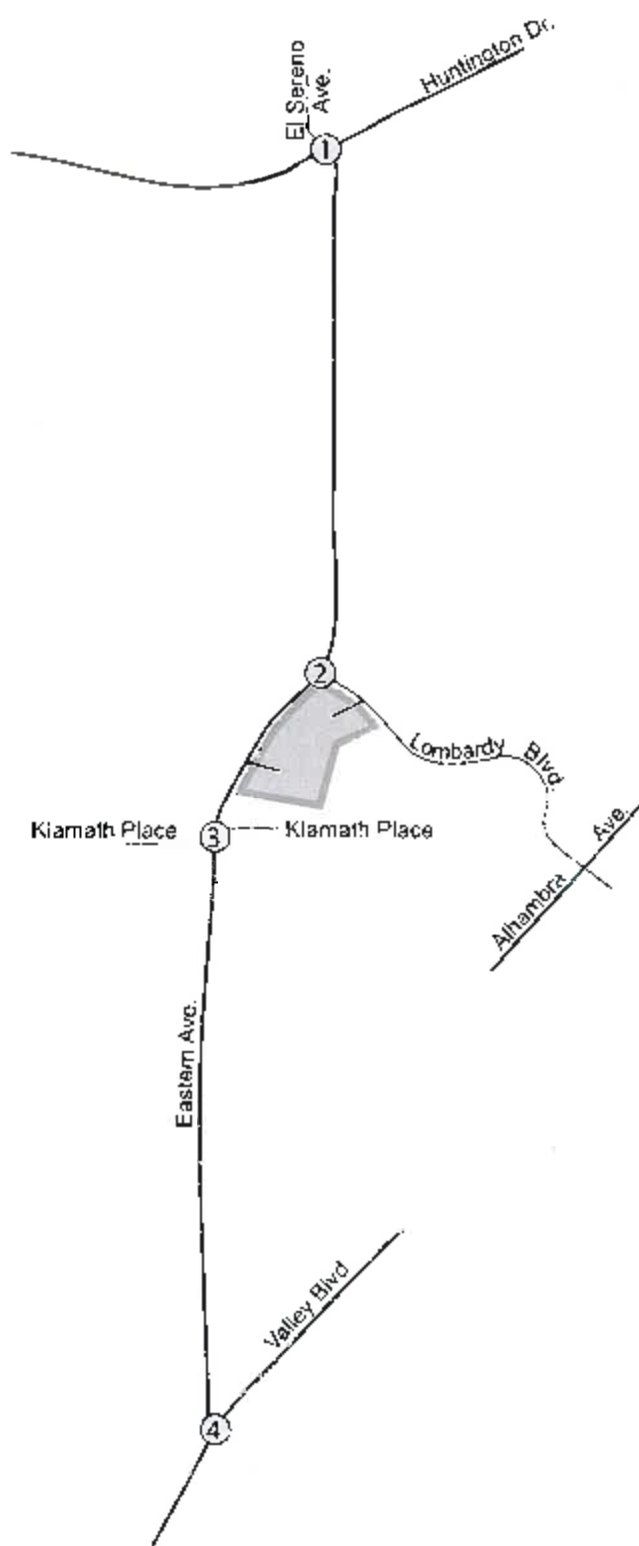
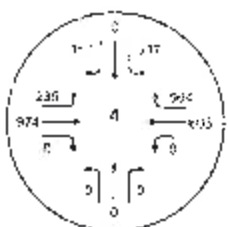
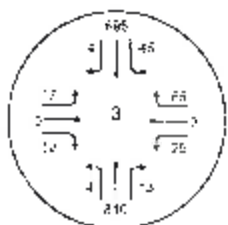
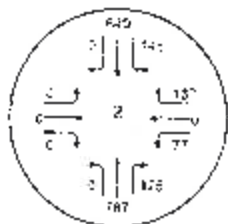
**LEGEND**

- Project Location
- Study Intersections
- Intersection Volumes




Source: KOA Corporation Planning & Engineering, 2016.



Not to Scale



**LEGEND**

-  Project Location
-  Study Intersections
-  Intersection Volumes

Source: KOA Corporation Planning & Engineering, 2016.



Not to Scale

**Table IV-37  
Existing Plus Project LOS**

Study Intersection		Existing 2016		Existing + Project		Change in V/C	Significant Impact?
		V/C	LOS	V/C	LOS		
<b>AM PEAK HOUR</b>							
1	Eastern Ave./El Sereno Ave. & Huntington Dr.	0.727	C	0.730	C	0.003	NO
2	Eastern Ave. & Lombardy Boulevard	0.534	A	0.536	A	0.002	NO
3	Eastern Ave. & Klamath St	0.401	A	0.405	A	0.004	NO
4	Eastern Ave. & Valley Blvd.	0.824	D	0.828	D	0.004	NO
<b>PM PEAK HOUR</b>							
1	Eastern Ave./El Sereno Ave. & Huntington Dr.	0.785	C	0.789	C	0.004	NO
2	Eastern Ave. & Lombardy Boulevard	0.374	A	0.378	A	0.004	NO
3	Eastern Ave. & Klamath St	0.270	A	0.276	A	0.006	NO
4	Eastern Ave. & Valley Blvd.	0.435	A	0.443	A	0.008	NO
<i>Source: KOA Corporation, 2016</i>							

### Cumulative Impacts

#### *Ambient Growth*

The future period forecast includes an ambient growth rate to account for both population and employment growth in the project vicinity. A conservative growth factor of 1.02 was applied to the existing traffic volumes to reflect growth from year 2016 conditions to year 2020 conditions.

#### *Related Projects*

Based on a review of the area/related project lists provided by LADOT Development Review, a list of four area/related projects was identified for inclusion in the traffic analysis. These projects are located within an approximate 1.5-mile radius from the site. Table IV-38 and Figure IV-12 illustrates the locations of the area/related projects. Table IV-38 summarizes the trip generation of the included related projects. The related projects traffic was added to the surrounding street system in the study area.




**Table IV-38  
Related Projects Trip Generation**

	Related Project	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
1	Grifols Pharmaceutical Manufacturing Facility 5557 E. Valley Blvd.  -Clean Room & Lab 40,000 sf -Office 16,700 sf -Mechanical Support 37,600 sf	316	46	14	60	22	39	61
2	Mixed Commercial 5479 E. Huntington Dr.  -Car Wash Other -Restaurant 1,916 sf -Retail 1,880 sf	1,155	26	24	50	58	40	98
3	Single-Family Homes 2739 N. Oayx Dr.  -31 homes	295	6	17	23	20	11	31
4	Warehouse 1925 N. Marianna Ave.  -Warehouse 196,000 sf	698	110	24	134	28	83	111

Source: KOA Corporation, 2016



**LEGEND**

-  Project Location
-  Parks
-  Related Project Locations

Source: KOA Corporation Planning & Engineering, 2016.



Not to Scale

***Future 2020 Without-Project Conditions***

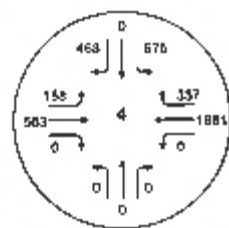
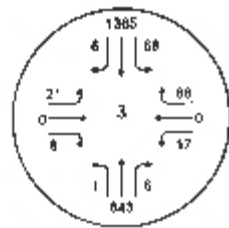
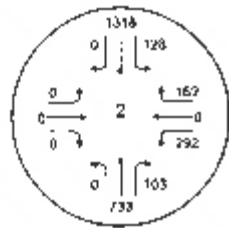
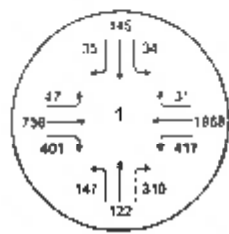
The Future 2020 Without-Project traffic volumes are shown on Figure IV-13 for the AM peak hour and on Figure IV-14 for the PM peak hour. Table IV-39 summarizes the V/C and LOS values at the study intersections for future 2020 conditions under this scenario. As shown, all of the study intersections are projected to operate at a good level of service (with some reductions to LOS D but not E or F) for the Future 2018 Without-Project conditions during the AM and PM peak hours.

***Future 2020 With-Project Conditions***




The Future 2020 With-Project traffic volumes are shown on Figure IV-15 for the AM peak hour and on Figure IV-16 for the PM peak hour. Table IV-39 summarizes the V/C and LOS values at the study intersections for future 2020 conditions under this scenario. As shown, the Project would not result in any significant LOS impacts at any of the study intersections. Therefore, Project impacts under the Future 2020 With-Project traffic conditions would be less than significant.

***Construction Traffic***

Construction of the Project would generate construction-related traffic trips associated with delivery of construction equipment and materials, construction workers, and export of approximately 78,000 cubic yards of dirt. All construction-related traffic trips would occur outside of the peak hours for traffic conditions in the Project area (7:00 AM to 9:00 AM and 4:00 PM to 6:00 PM). Construction workers would arrive at the Project site around 7:00 AM and would leave around 3:00 PM. In accordance with Mitigation Measure 16-1, all construction equipment and vehicles (including workers' cars) would be parked/staged on the Project site and not on the streets near the Project site. The roadways providing access to and from the Project site would not be blocked by construction equipment during any phase of construction. Additionally, due to the Project site's proximity to Farndale Elementary and El Sereno Middle School, the Project Applicant would be required to comply with Mitigation Measures 16-2 and 16-4, which include coordination with the schools' administrators regarding the Project's construction schedule, activities, and hauling of dirt. With implementation of Mitigation Measures 16-1 through 16-5, the Project's construction-related traffic impacts would be less than significant.



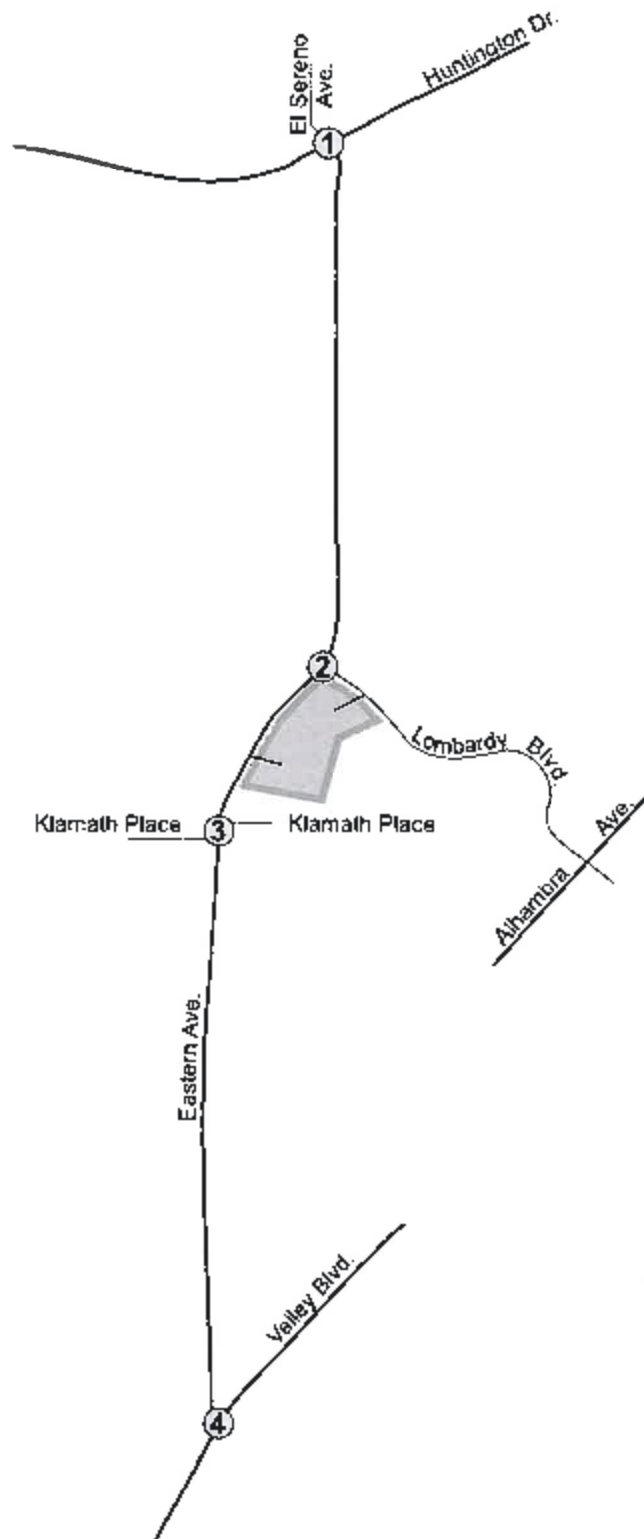
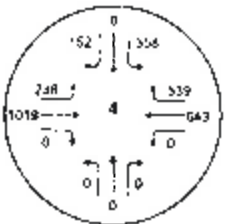
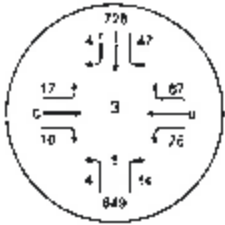
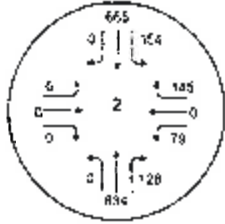
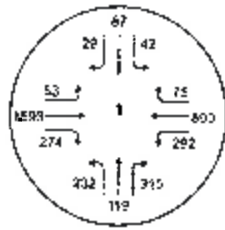
**LEGEND**

-  Project Location
-  Study Intersections
-  Intersection Volumes

Source: KOA Corporation Planning & Engineering, 2016.



Not to Scale



**LEGEND**

- Project Location
- Study Intersections
- Intersection Volumes

Source: KOA Corporation Planning & Engineering, 2015.



Not to Scale



**Table IV-39  
Future 2020 Without and With Project LOS**

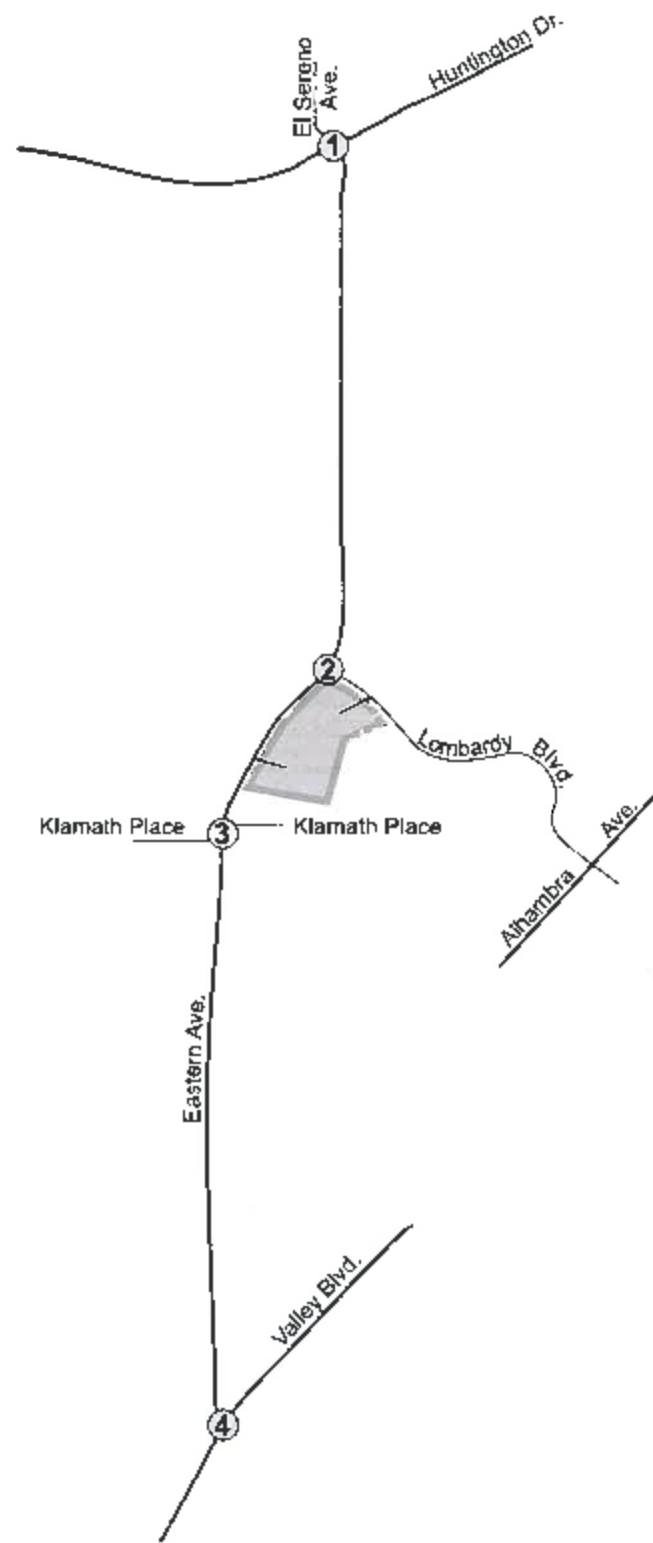
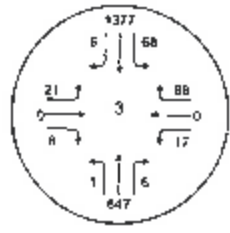
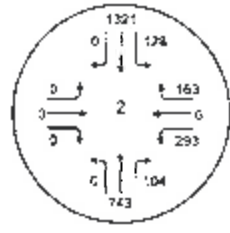
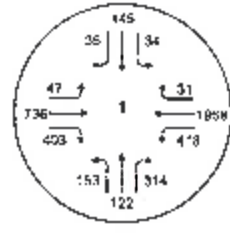
Study Intersection	Existing 2016		Future 2020 No Project		Future 2020 With Project		Change in V/C	Significant Impact?	
	V/C	LOS	V/C	LOS	V/C	LOS			
<b>AM PEAK HOUR</b>									
1	Eastern Ave./El Sereno Ave. & Huntington Dr.	0.727	C	0.781	C	0.784	C	0.003	NO
2	Eastern Ave. & Lombardy Boulevard	0.534	A	0.555	A	0.557	A	0.002	NO
3	Eastern Ave. & Klamath St	0.401	A	0.417	A	0.421	A	0.004	NO
4	Eastern Ave. & Valley Blvd.	0.824	D	0.859	D	0.864	E	0.005	NO
<b>PM PEAK HOUR</b>									
1	Eastern Ave./El Sereno Ave. & Huntington Dr.	0.785	C	0.826	D	0.830	E	0.004	NO
2	Eastern Ave. & Lombardy Boulevard	0.374	A	0.392	A	0.396	A	0.004	NO
3	Eastern Ave. & Klamath St	0.270	A	0.284	A	0.290	A	0.006	NO
4	Eastern Ave. & Valley Blvd.	0.435	A	0.456	A	0.464	A	0.008	NO

Source: KOA Corporation, 2016.




b) Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the count congestion management agency for designated roads or highways?

**No Impact.** The Congestion Management Plan (CMP) is a State-mandated program that serves as the monitoring and analytical basis for transportation funding decisions in the County made through the Regional Transportation Improvement Program (RTIP) and State Transportation Improvement Program (STIP) processes. The CMP requires that a Traffic Impact Analysis (TIA) be performed for all CMP arterial monitoring intersections where a project would add 50 or more trips during either the morning or afternoon weekday peak hours and all mainline freeway monitoring locations where a project would add 150 or more trips (in either direction) during the morning or afternoon weekday peak hours.

Because the Project would not generate 50 or more peak-hour trips, the Project would not add 50 or more trips during the morning or afternoon peak hours at CMP monitoring intersections, no significant impacts would occur as a result of the Project, and no further review of potential impacts to intersection monitoring locations that are part of the CMP system is required.



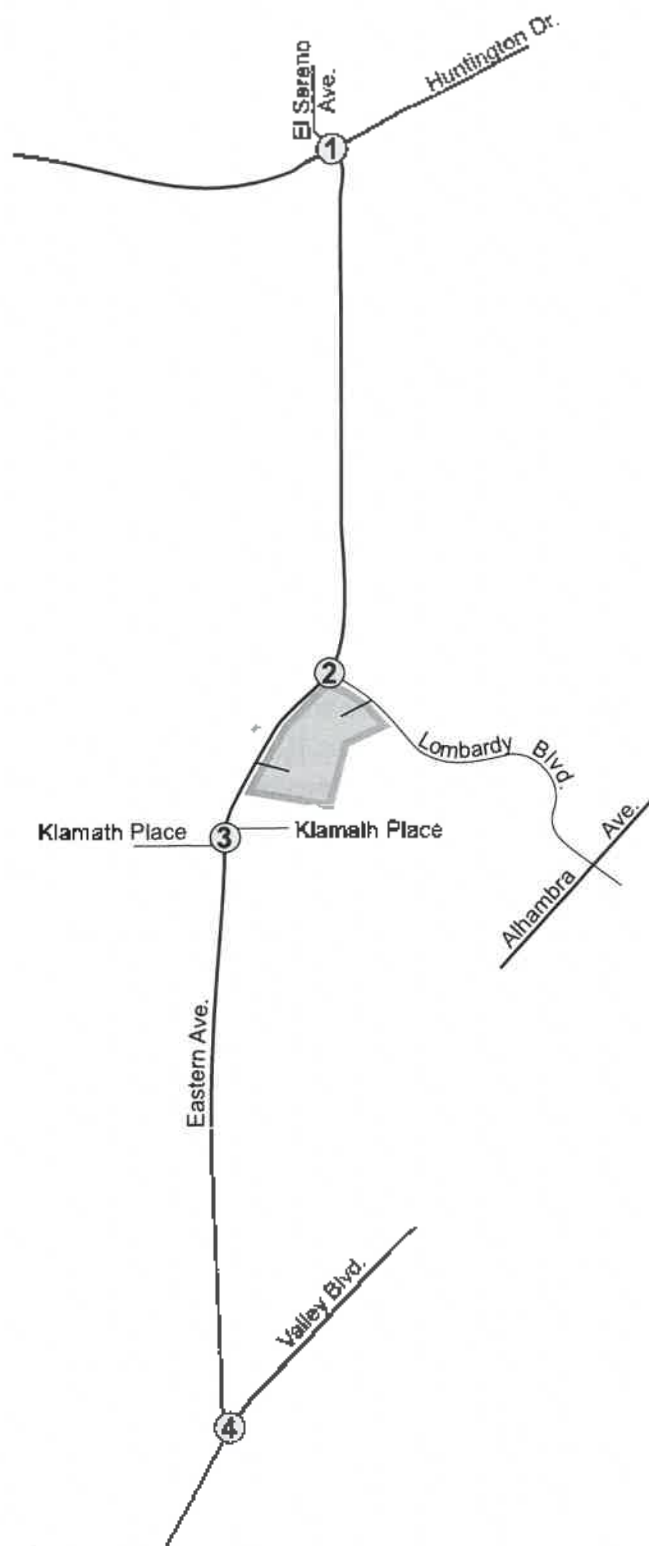
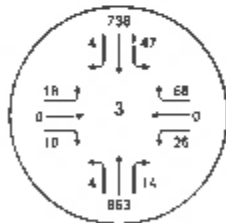
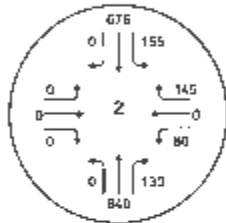
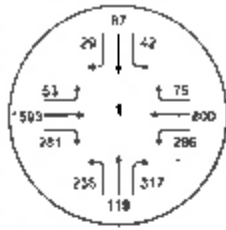
**LEGEND**

-  Project Location
-  Study Intersections
-  Intersection Volumes




Source: KOA Corporation Planning & Engineering, 2016.



Not to Scale



**LEGEND**

-  Project Location
-  Study Intersections
-  Intersection Volumes

Source: KOA Corporation Planning & Engineering, 2016.



Not to Scale

**c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?**

**No Impact.** The Project includes development of 42 single-family homes, reaching approximately 22 feet in height, a height that is within the height range of the existing buildings in the Project area. The Project site is not located near any airports. Thus, the Project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. Therefore, no impacts related to this issue would occur.

**d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

**Less Than Significant Impact.** The Project does not include development of any roadway infrastructure. The Project includes development of 42 single-family homes, similar to those found in the immediate vicinity of the Project site. The majority of the Project homes would have vehicles access to the Project site area roadway network via a driveway on Eastern Avenue. The driveway would be located between the Eastern Avenue/Klamath Street-Hammony Lane intersection on the south and the Eastern Avenue/Ruth Swiggett Drive intersection (park access) on the north.

Level of service calculations were reviewed for the Eastern Avenue Project driveway location, using the Project trip generation at the west site driveway and the thru volumes on Eastern Avenue defined by the study intersections to the north and south. The inbound/southbound left-turn movement into the Project site would use the existing striped center two-way left-turn lane within the roadway. The Project inbound vehicle movements expected during the peak hours is 7 vehicles and 22 vehicles for the a.m. and p.m. peak hours, respectively.

The calculations indicate that the queuing at the southbound left-turn movement, at the inbound flow to the Eastern Avenue Project driveway, would be less than one vehicle on average. With two to three vehicles potentially queuing, although this would be a rare occurrence, there would be adequate length within the center two-way left-turn lane to provide adequate access to both the park use on the north via a northbound left-turn movement, and access to the Project site via a southbound left-turn movement. Thus, the Project would not create any hazards, and no impacts would occur as a result of the Project.

**e) Would the project result in inadequate emergency access?**

**Less Than Significant Impact.** The Project includes development of 42 single-family homes, similar to those found in the immediate vicinity of the Project. Each home would include a driveway that extends from on-site roadways to the garages associated with the homes. All parking associated with the homes would be provided at the site of the homes and not on the roadways. Additionally, all ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department and City Fire Department standards and requirements for design and

construction. Therefore, the Project would not result in any significant impacts related to emergency access.

**f) Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?**

**No Impact.** The Project would generate approximately 114 people, which would not put a great demand on transit services in the Project area. No impacts related to this issue would occur as a result of the Project.

#### **Mitigation Measures (Traffic/Transportation)**

To ensure that no significant construction-related traffic impacts occur during the Project's construction phase, the following mitigation measures are required:

##### **16-1: Hillside Construction Staging and Parking Plan**

- Prior to the issuance of a grading or building permit, the applicant shall submit a Construction Staging and Parking Plan to the Department of Building and Safety and the Fire Department for review and approval. The plan shall identify where all construction materials, equipment, and vehicles will be stored through the construction phase of the project, as well as where contractor, subcontractor, and laborers will park their vehicles so as to prevent blockage of two-way traffic on streets in the vicinity of the construction site. The Construction Staging and Parking Plan shall include, but not be limited to, the following:
  - No construction equipment or material shall be permitted to be stored within the public right-of-way.
  - If the property fronts on a designated Red Flag Street, on noticed "Red Flag" days, all the workers shall be shuttled from an off-site area, located on a non-Red Flag Street, to and from the site in order to keep roads open on Red Flag days.
  - During the Excavation and Grading phases, all haul trucks shall be staged on the Project site. The drivers shall be required to follow the designated travel plan or approved Haul Route.
  - Truck traffic directed to the project site for the purpose of delivering materials, construction-machinery, or removal of graded soil shall be limited to off-peak traffic hours, Monday through Friday only. No truck deliveries shall be permitted on Saturdays or Sundays.

- o All deliveries during construction shall be coordinated so that all vendor/delivery vehicles will stage and make deliveries on the project site, and that a construction supervisor is present at such time.
- o A radio operator shall be on-site to coordinate the movement of material and personnel, in order to keep the roads open for emergency vehicles, their apparatus, and neighbors.
- o During all phases of construction, all construction vehicle parking and queuing related to the project shall be as required to the satisfaction of the Department of Building and Safety, and in substantial compliance with the Construction Staging and Parking Plan, except as may be modified by the Department of Building and Safety or the Fire Department.

**16-2: Construction Activity Near Schools**

- The Project developer and contractors shall maintain ongoing contact with administrators of the Farndale Elementary School and the El Sereno Middle School. The administrative offices shall be contacted when demolition, grading and construction activity begin on the Project site so that students and their parents will know when such activities are to occur. The developer shall obtain school walk and bus routes to the schools from either the administrators or from the LAUSD's Transportation Branch (323) 342-1400 and guarantee that safe and convenient pedestrian and bus routes to the school be maintained.
- The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
- There shall be no staging or parking of construction vehicles, including vehicles to transport workers on any of the streets adjacent to the school.
- Due to noise impacts on the schools, no construction vehicles or haul trucks shall be staged or idled on these streets during school hours.

**16-3: Schools affected by Haul Route**

- LADBS shall assign specific haul route hours of operation based upon Farndale Elementary School and El Sereno Middle School hours of operation.
- Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the school during periods when school is in session especially when students are arriving or departing from the campus.

**16-4: Good Neighbor Construction Practices**

- Whenever possible, construction vehicles should be parked on site to prevent congestion on streets with limited parking.
- When temporarily blocking portions of streets for deliveries of construction materials, a flag person shall be provided to assist with pedestrian and vehicular traffic.
- Street closures shall not take place during peak traffic hours. Any street, sidewalk, or other improvement work shall be conducted in conformance with the latest Manual on Work Area Traffic Control.
- Care shall be taken not to overfill concrete trucks during deliveries. If spills occur, it shall be the responsibility of the concrete company to immediately provide clean up.
- Construction noise shall be kept to a minimum with consideration of the surrounding neighbors. Unnecessary noise such as music shall be kept below legal levels.
- Streets and sidewalks adjacent to construction sites shall be swept free of construction debris at all times.
- Care shall be taken to not interfere with trash pick-up by the Bureau of Sanitation. Construction and delivery vehicles shall be subject to trash pick-up parking restrictions.
- If building materials are to be stored in public right of ways, it shall be by permit from the Department of Public Works, Bureau of Street Services, Investigations and Enforcement Division and shall conform with all applicable rules.
- All construction/demolition activities shall comply with the construction hours in Section 41.40 of the LAMC.

**16-5:** The Project Applicant shall plan construction and construction staging as to maintain pedestrian access to adjacent active land uses throughout all construction phases. This requires the Applicant to maintain adequate and safe pedestrian protection, including physical separation from workspace and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times. Barriers, such as K-Rails, scaffolding, etc., shall be maintained at a height of 8 feet.

**Cumulative Impacts**

Similar to the Project, the applicants of the related projects shown on Table IV-38 would be required by the City to implement measures similar to Mitigation Measures 16-1 through 16-3 identified for the Project's construction traffic, if these related projects included construction activities on a hillside and/or near schools. Cumulative traffic impacts were addressed previously under "Future With-Project Conditions." As shown on Table IV-39, no significant cumulative impacts would occur.

**17. TRIBAL CULTURAL RESOURCES**

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 size and scope of the landscape, sacred place, or object with cultural value to a California Native 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**

**Less Than Significant Impact.** The Project site is vacant and does not contain any structures. Based on a records search conducted by the South Central Coast Information Center (refer to Appendix D), no archaeological sites have been recorded within the Project site, and no archaeological resources have been recorded within 0.5-mile radius of the Project site. However, it is possible that unknown archaeological resources could exist at the Project site, given that significant archaeological resources have been identified in the Los Angeles area. As such, prior to Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying cultural resources or removing artifacts, human remains, bottles, and other cultural materials from the Project site. In addition, in the event that buried archaeological resources are exposed during Project construction, work within 50 feet of the find shall stop until a professional archaeologist, meeting the standards of the Secretary of the Interior, can identify and evaluate the significance of the discovery and develop recommendations for treatment, in conformance with California Public Resources Code Section 21083.2. However, construction activities could continue in other areas of the Project site. Recommendations could include preparation of a Treatment Plan, which could require recordation, collection and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any Native American remains shall be treated in accordance with state law. Through compliance with these requirements, potential Project impacts to unknown archaeological (tribal) resources would be less than significant.

- 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, the lead agency shall consider the significance of the resource to a California Native American tribe?**

**Less Than Significant Impact.** Pursuant to AB 52, the Department of City Planning notified Native American tribes as to the Project with a 30-day comment period on December 28, 2016. A letter was received, dated January 10, 2017, from the Gabrieleno Band of Mission Indians requesting that an approved Native American Monitor(s) be present during future ground disturbance. However, the letter provided no documentation regarding the potential for significant tribal resources to exist at the Project site. As stated previously, the Project site is vacant and does not contain any structures, but has been developed in the past. Based on a records search conducted by the South Central Coast Information Center (refer to Appendix D), no archaeological sites have been recorded within the Project site. However, it is possible that unknown archaeological resources could exist at the Project site, given that significant archaeological resources have been identified in the Los Angeles area. As such, prior to



Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying cultural resources or removing artifacts, human remains, bottles, and other cultural materials from the Project site. In addition, in the event that buried archaeological resources are exposed during Project construction, work within 50 feet of the find shall stop until a professional archaeologist, meeting the standards of the Secretary of the Interior, can identify and evaluate the significance of the discovery and develop recommendations for treatment, in conformance with California Public Resources Code Section 21083.2. However, construction activities could continue in other areas of the Project site. Recommendations could include preparation of a Treatment Plan, which could require recordation, collection and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any Native American remains shall be treated in accordance with state law. Through compliance with these requirements, potential Project impacts to unknown archaeological/tribal resources would be less than significant.

#### **Cumulative Impacts**

Refer to discussion of cumulative impacts related to parks and recreational facilities under response to Checklist Issue 5.

## **18. UTILITIES AND SERVICE SYSTEMS**

### **a) Would the project exceed wastewater treatment requirements of the applicable regional water quality control board?**

**Less Than Significant Impact.** The Project site is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the Los Angeles Regional Water Quality Control Board's (LARWQCB) discharge policies for the Santa Monica Bay. The HTP currently treats an average daily flow of approximately 362 mgd. Thus, there is approximately 88 mgd available capacity.

The Project would generate approximately 8,400 gallons of wastewater per day (or 0.0084 mgd) (refer to Table IV-40.<sup>82</sup> With a remaining daily capacity of 88 mgd, the HTP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

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<sup>82</sup> This conservatively assumes the amount of wastewater equals water consumption.

**Table IV-40  
Estimated Water Consumption**

Residential Dwelling Units	Size	Consumption Rate	Total (gallons/day)
3-bedroom	42	200 gpd/du	8,400

*Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, March 20, 2002.  
Note: Water generation rates are approximately 110% of the wastewater generation rates.*

### Cumulative Impacts

Implementation of the related projects listed on Table IV-38 could increase the need for wastewater treatment. The remaining treatment capacity of the HTP (88 mgd) would accommodate the wastewater treatment requirements of the related projects. As discussed previously, the Project would create the need for a fraction of one percent of the remaining capacity of the HTP, and would not result in any significant impacts related to sewer treatment. No new or upgraded treatment facilities would be required. Therefore, cumulative impacts related to wastewater treatment would be less than significant.

**b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

**Less Than Significant Impact.** The Los Angeles Department of Water and Power (LADWP) owns and operates the Los Angeles Aqueduct Filtration Plant (LAAFP) located in the Sylmar community of the City. The LAAFP treats City water prior to distribution throughout LADWP's Central Water Service Area. The designated treatment capacity of the LAAFP is 600 mgd, with an average plant flow of 550 mgd during the summer months and 450 mgd in the non-summer months. Thus, the facility has between approximately 50 to 150 mgd of remaining capacity depending on the season.

As shown on Table IV-40, the Project would consume approximately 8,400 gallons of water per day. With the remaining capacity of approximately 50 to 150 mgd, the LAAFP would have adequate capacity to serve the Project. Therefore, Project impacts related to water treatment would be less than significant.

### Cumulative Impacts

Implementation of the related projects listed on Table IV-38 could increase the need for water treatment. The remaining treatment capacity of the LAAFP (50 to 150 mgd) would accommodate the wastewater treatment requirements of the related projects. As discussed previously, the Project would create the need for a fraction of one percent of the remaining capacity of the LAAFP, and would not result in any significant impacts related to water treatment. No new or upgraded treatment facilities would be required. Therefore, cumulative impacts related to water treatment would be less than significant.

c) **Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

**Less Than Significant Impact.** As discussed in response to Checklist Question 9e, the Project would not exceed the capacity of the existing or planning drainage system. Therefore, Project impacts related to storm drain capacity would be less than significant.

#### **Cumulative Impacts**

Refer to the discussion of cumulative impacts under response to Checklist Question 9.

d) **Would the project have significant water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

**Less Than Significant Impact.** As shown on Table IV-40, the Project would consume approximately 8,400 gallons of water per day. According to the Los Angeles Department of Water and Power (LADWP), projects that conform to SCAG's demographic projections and are located within the City's service area have been accounted for in LADWP's water supply planning efforts.<sup>81</sup> As discussed previously in response to Checklist Question 10b, the Project is consistent with the City's General Plan land use designation for the Project site. Additionally, the Project would include a cistern system that would capture rainwater to use for landscape irrigation in order to help reduce the Project's overall water consumption. Further, the Project would be required to incorporate all of the applicable mandatory water conservation measures identified Chapter 4 of the 2016 California Green Building Standards Code. As such, the Project would not require new or additional water supply or entitlements. Therefore, Project impacts related to water supply would be less than significant.

#### **Cumulative Impacts**

As discussed previously, the Project would result in a net water consumption increase of approximately 8,400 gallons of water per day. Implementation of the related projects listed on Table IV-38 could result in a net increase in water consumption within LADWP's service area. Similar to the Project, the water supply needs of those related projects that are consistent with the City's General Plan have been accounted for in the most recently adopted UWMP. However, the applicants of all projects within LADWP's service area would be required to consult with LADWP to determine the specific water supply needs of the project, appropriate water conservation measures to minimize water usage, and LADWP's

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<sup>81</sup> Los Angeles Department of Water and Power, Amir Tabakh, Chief of Energy Efficiency Engineering, correspondence, June 15, 2015. (Refer to Appendix J.)

ability to serve the project. Through this process, cumulative impacts related to water supply would be less than significant.

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

**Less Than Significant Impact.** As discussed in response to Checklist Question 17a, with a remaining daily capacity of 88 mgd, the HTP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

f) **Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**

**Less Than Significant Impact.** Most of the solid waste generated in the City is disposed of at the Sunshine Canyon Landfill and Chiquita Canyon Landfill. The Sunshine Canyon Landfill is jointly operated by the City and the County (each operates separate portions of the landfill). The Sunshine Canyon Landfill currently has a remaining capacity of 64,688,021 tons, with a permitted intake of 12,100 tons per day (tpd) and currently accepts an average of 7,582 tpd and therefore, has a remaining daily intake availability of 4,518 tpd.<sup>64</sup> The Chiquita Canyon Landfill currently has a remaining capacity of 1,833,3553 tons, with a permitted intake of 6,000 tpd and currently accepts an average of 3,558 tpd, with a remaining daily intake availability of 2,442 tpd.<sup>65</sup> Thus, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill have a combined remaining permitted daily intake of 6,960 tpd.

The Project is estimated to generate an increase of approximately 1,140 pounds per day (or 0.57 tons/day) of solid waste. With a remaining daily capacity of 6,690 tpd, the existing landfill capacity would be adequate to accommodate the Project's solid waste generation. Therefore, Project impacts related to solid waste would be less than significant.

### Cumulative Impacts

Implementation of the related projects listed on Table IV-38 could increase the need for landfill capacity. However, all development in the City is required to comply with the City's Curbside Recycling Program and the Construction and Demolition Waste Recycling Ordinance to minimize the amount of solid waste generated by the development and the need for landfill capacity. As discussed previously, the landfills serving the Project area have available capacity. The Project would create a demand for less than a fraction of one percent of the remaining landfill capacity serving the Project area and would not result in

<sup>64</sup> County of Los Angeles, *Countywide Integrated Waste Management Plan, 2014 Annual Report, December 2015*.

<sup>65</sup> *Ibid.*

any significant impacts. Therefore, cumulative impacts related to landfill capacity would be less than significant.

**g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?**

**Less Than Significant Impact.** The Project would be required to comply with the City's Curbside Recycling Program and the Construction and Demolition Waste Recycling Ordinance related to solid waste generation, and no significant impacts related to this issue would occur.

## **19. MANDATORY FINDINGS OF SIGNIFICANCE**

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

**Less Than Significant With Mitigation Incorporated.** For the reasons stated in this Initial Study, with incorporation of the identified mitigation measures, the Project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

**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.** For the reasons stated in this Initial Study, the Project would not result in any significant impacts would not have the potential to contribute to significant cumulative impacts.

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

**Less Than Significant With Mitigation Incorporated.** For the reasons stated in this Initial Study, with incorporation of the identified mitigation measures, the Project would not cause substantial adverse effects on human beings, either directly or indirectly.

