

3.0 CEQA Screening and Significance Thresholds

On July 27, 2017, the City of Los Angeles (City) issued the Notice of Preparation and Initial Study/Environmental Checklist for the proposed Project (Project). The Initial Study, as provided under the California Environmental Quality Act (CEQA), utilized CEQA Guidelines (14 California Code of Regulations), Appendix G, to determine if the project may have a significant effect on the environment. The City concluded that the Project may have a significant effect on the environment and that an environmental impact report (EIR) would be prepared.

In the preparation of the Draft EIR, the City opted to be guided by a combination of Appendix G and the City of Los Angeles' 2006 *L.A. CEQA Thresholds Guide*, a guidance document adopted by the City Council of the City of Los Angeles pursuant to CEQA Guidelines Section 15064.7(b) to assist in responding to the questions in the State's Appendix G and to provide significance thresholds to assist in determining whether a project's impacts would be significant, to formulate the CEQA screening and significance thresholds for the Project.

While the Draft EIR was being prepared for finalization, on December 28, 2018, the State Office of Administrative Law approved and made effective revised CEQA Guidelines, including a revised Appendix G, submitted by the State Natural Resources Agency. The Resources Agency stated in its Final Statement of Reasons for the revised CEQA Guidelines, dated November 18, 2018, that it "reiterates that Appendix G is only a sample form," that it is "only suggested and public agencies are free to devise their own format for an initial study," and that "CEQA grants agencies discretion to develop their own thresholds of significance."

For purposes of the screening and significance thresholds for the Draft EIR, the City re-evaluated the proposed thresholds it was intending to utilize for the Project in light of the 2018 revisions to Appendix G. A summary of the re-evaluation is provided below in Table 3.0-1. Pursuant to this re-evaluation, the City, in its discretion as provided under CEQA, has elected for the Draft EIR to revise some of the previous thresholds it had developed before the 2018 revisions to Appendix G, and has elected to retain the rest of the previous Project specific thresholds it had developed before the 2018 revisions Appendix G, since they are consistent with the 2018 revisions to Appendix G.

For transportation impacts, on July 30, 2019, the City Council, pursuant to CEQA Guidelines 15064.7(b), approved the Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines (LADOT Guidelines) that were prepared consistent with the 2018 revisions to the CEQA Guidelines and Appendix G. The Draft EIR has elected to use thresholds consistent with the LADOT Guidelines.

Table 3.0-1 Evaluation of Proposed Thresholds with 2018 Revised Appendix G

| Environmental Factors Evaluated in the EIR | Sidewalk Repair Project Thresholds | 2018 Revised Appendix G of the CEQA Guidelines | Evaluation of the 2018 Revised Appendix G of the CEQA Guidelines |
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| AESTHETICS | AES-1. Would the proposed Project substantially damage or degrade a designated scenic vista or state scenic highway? | a) Have a substantial adverse effect on a scenic vista? | No change to threshold, no effect on document |
| | AES-2. Would the proposed Project substantially damage or degrade recognized or valued views, including natural views of topography, mountains, oceans, or man-made visual features, in City of LA adopted land use plans? | b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway? | No change to threshold, no effect on document |
| | AES-3. Would the proposed Project substantially damage or degrade existing features or elements that contribute to the existing visual character or image of a neighborhood, community, or localized area through removal, alteration, or demolition of street trees? | c) <u>In non-urbanized areas,</u> substantially degrade the existing visual character or quality of <u>public views</u> of the site and its surroundings? <u>(Public views are those that are experienced from publicly accessible vantage point).</u> | Limits the threshold to public views. This is consistent with the threshold that is in use. |
| | <ul style="list-style-type: none"> • The degree of contrast between proposed features and existing features that represent the area’s valued aesthetic image. • The degree to which the project would contribute to the area’s aesthetic value. • The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment | | |

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| | AES-4. Would the proposed Project substantially damage visual landscape, including but not limited to street trees, utility poles, or historic structures within public right- of- way | | Addressed above in AES-3 |
| | AES-5. Would the proposed Project conflict with applicable guidelines and regulations on aesthetics of the project site? | c) <u>(continued) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?</u> | New threshold is consistent with AES-5 language. No action recommended. |
| | AES-6. Would the proposed Project result in the substantial loss of shading as a result of street tree retention, removal, or replacement throughout the project buildout? | d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | No applicable appendix G threshold |
| AIR QUALITY | AQ-1: Would the proposed Project conflict with or obstruct implementation of the SCAQMD AQMP? | Where available, the significance criteria established by the applicable air quality management <u>district</u> or air pollution control district may be relied upon to make the following determinations. Would the project: | Clarification of threshold – no change recommended |
| | AQ-2: Would the proposed Project generate air pollutant emissions during construction activities of sufficient quantity to exceed the Air Quality | a) Conflict with or obstruct implementation of the applicable air quality plan? b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | Because SCAQMD still has thresholds for CO and Sox, these two pollutants, we recommend that we continue to analyze |

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| | Significance Thresholds established by the SCAQMD? | b) Result in a cumulatively considerable net increase in any criteria pollutant for which the project region is in nonattainment status under an applicable federal or state ambient air quality standard (this includes the release emissions that exceed quantitative thresholds for zone precursors)? | these pollutants. We can add footnote in our emission tables to say that while the region is in attainment for these pollutants, we are still evaluating the pollutants consistent with SCAQMD's established thresholds anyway |
| | AQ-3: Would the proposed Project generate air pollutant emissions during operational activities of sufficient quantity to exceed the Air Quality Significance Thresholds established by the SCAQMD? | | Addressed above in AQ-2 |
| | AQ-4: Would the proposed Project expose sensitive receptors to substantial TAC concentrations? | c) Expose sensitive receptors to substantial pollutant concentrations? | No change to threshold, no effect on document |
| | AQ-5: Would the proposed Project create objectionable odors affecting a substantial number of people? | d) <u>Result in other emissions (such as those leading to odors that would affect adversely affecting a substantial number of people?</u> | Clarification – This edit could be included in the City threshold. Potential Action Item. Would not change analysis. |
| BIOLOGICAL RESOURCES | BIO-1: Would the proposed Project result in the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, or candidate species, or a Species of Special Concern or federally listed critical habitat? | a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service? | No change to threshold, no effect on document |

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| | <p>BIO-2: Would the proposed Project result in the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community?</p> | <p>b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?</p> | <p>No change to threshold, no effect on document</p> |
| | <p>BIO-3: Would the proposed Project result in interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species?</p> | | <p>No threshold, no effect on document</p> |
| | <p>BIO-4: Would the proposed 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?</p> | <p>c) Have a substantial adverse effect on <u>state or federally protected wetlands, as defined by Section 404 of the Clean Water Act</u> (including marshes, vernal pools, coastal areas, etc.), through direct removal, filling, hydrological interruption, or other means?</p> | <p>Clarification – This edit could be included in the City threshold. Potential Action Item</p> |
| | <p>BIO-5: Would the proposed 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?</p> | <p>d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?</p> | <p>No change to threshold, no effect on document</p> |

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| | BIO-6: Would the proposed Project conflict with any local policies or ordinances protecting a street tree preservation policy or ordinance? | e) Conflict with any local policies or ordinances to protect biological resources, such as a tree preservation policy or ordinance? | No change to threshold, no effect on document |
| | BIO-7: Would the proposed 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? | f) Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan? | No change to threshold, no effect on document |
| CULTURAL RESOURCES | CUL-1: Would the proposed Project result in the demolition of a significant historical resource as defined in Section 15064.5(A) of the CEQA guidelines? | a) Cause a substantial adverse change in the significance of a historical resource as defined pursuant to in § 15064.5 | Clarification to language, no change recommended. |
| | CUL-2: Would the proposed Project result in relocation that does not maintain the integrity and significance of a significant historical resource? | | No appendix G threshold, no effect on document |
| | CUL-3: Would the proposed Project result in the conversion, rehabilitation, or alteration of a significant historical resource which does not conform to the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings? | | No appendix G threshold, no effect on document |
| | CUL-4: Would the proposed Project disturb, damage, or degrade an archaeological resource, or its setting, that is found to be important because it: | b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section | No change to threshold, no effect on document |

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| | <ul style="list-style-type: none"> • Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory; • Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions; • Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind; • Is at least 100 years old and possesses substantial stratigraphic integrity; or • Involves important research questions that historical research has shown can be answered only with archaeological methods. | <p>15064.5 of the State CEQA Guidelines?</p> | |
| | <p>CUL-5: Would the proposed Project result in the permanent loss of, or loss of access to, a paleontological resource of regional or statewide significance?</p> | <p>e) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</p> | <p>Deletion – Removal of this threshold could occur. Potential Action Item</p> |

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| | CUL-6: Would the proposed Project cause disturbance of human remains, including remains interred outside of formal cemeteries? | c) Disturb any human remains, including those interred outside of formal cemeteries? | No change to threshold, no effect on document |
| ENERGY | <p>1. Result in the wasteful, inefficient, or unnecessary consumption of energy.</p> <p>2. Result in a substantial increase in demand for transmission service, resulting in the need for new or expanded sources of energy or new or expanded energy delivery systems or infrastructure.</p> | <p>a) <u>Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?</u></p> <p>b) <u>Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?</u></p> | <p>New threshold addressed in document, no action recommended</p> <p>New threshold not yet addressed in document – potential action item</p> |
| GEOLOGY AND SOILS | GEO-1: Would the proposed Project cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury resulting from rupture of a known earthquake fault; landslides; and seismic ground shaking or seismic ground shaking or seismic-related ground failure, including liquefaction? | <p>a) Expose people or structures to <u>Directly or indirectly cause</u> potential substantial adverse effects, including the risk of loss, injury, or death, involving:</p> <p>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</p> | Clarification in language – no action recommended |

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| | | <p>Special Publication 42.</p> <p>ii) Strong seismic ground shaking?</p> <p>iii) Seismically related ground failure, including liquefaction?</p> <p>iv) Landslides?</p> | |
| | <p>GEO-2: Would the proposed Project destroy, permanently cover, or materially and adversely modify one or more distinct and prominent geologic or topographic features. Such features may include, but are not limited to, hilltops, ridges, hill slopes, canyons, ravines, rock outcrops, water bodies, streambeds and wetlands?</p> | <p>f) <u>Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</u></p> | <p>New threshold is addressed in the document, no action recommended</p> |
| | <p>GEO-3: Would the proposed Project constitute a geologic hazard to other properties by causing or accelerating instability from erosion?</p> | <p>b) Result in substantial soil erosion or the loss of topsoil?</p> | <p>No change to threshold, no effect on document</p> |
| | <p>GEO-4: Would the proposed Project accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition that would not be contained or controlled on-site?</p> | | <p>No applicable Appendix G threshold</p> |
| | <p>GEO-5: Would the proposed Project be located on unstable soil or would result in an on-site or off-site landslide, collapse, or lateral spreading?</p> | <p>c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project and potentially result in on- or off-site landslides, lateral spreading,</p> | <p>Clarifications in language are consistent with threshold used in document</p> |

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| | | <p>subsidence, liquefaction, or collapse?</p> <p>d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994) creating substantial <u>direct or indirect</u> risks to life or property?</p> <p>e) Have 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</p> | <p>No change to threshold, no effect on document</p> |
| GREENHOUSE GAS EMISSIONS | <p>GHG-1. Would the Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?</p> | <p>a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</p> | <p>No change to threshold, no effect on document</p> |
| | <p>GHG-2. Conflict with any applicable plan, policy, regulation, or recommendation of an agency adopted for the purpose of reducing emissions of GHGs?</p> | <p>b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases</p> | <p>No change to threshold, no effect on document</p> |
| HAZARDS AND HAZARDOUS MATERIALS | <p>HAZ-1: Would the proposed Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions through the routine transport, use, or disposal of hazardous materials or handle in such a way as to involve the release of hazardous materials into the environment?</p> | <p>a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</p> <p>b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?</p> | <p>No change to threshold, no effect on document</p> |

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| | HAZ-2: Would the proposed Project emit/handle/involve hazardous materials and/or waste within one-quarter mile of an existing or proposed school? | c) Emit hazardous emissions or require the handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school? | No change to threshold, no effect on document |
| | HAZ-3: Would the proposed Project be located on a site that 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? | d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to U.S. Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment? | No change to threshold, no effect on document |
| | HAZ-4: Would the proposed Project hinder or impair an adopted emergency response or evacuation plan or route? | | No applicable Appendix G threshold |
| | | e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard <u>or excessive noise</u> for people residing or working in the project area? | Change to threshold has not been addressed in NOP. Item to be discussed. |
| | | f) For a project in the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? Impair implementation of or physically interfere with an adopted emergency evacuation plan? | Threshold was addressed in NOP, no action recommended |

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| | | g) Expose people or structures, <u>either directly or indirectly</u> to a significant risk of loss, injury, or death involving wildland fires, including areas where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | Clarification in language; item was addressed in NOP, no action recommended |
| HYDROLOGY AND WATER QUALITY | HyWQ-1. Would the proposed Project cause flooding during the projected 50-year developed storm event, which would have the potential to harm people or damage property or sensitive biological resources? | d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site? | Current analysis addresses deleted threshold. No action recommended |
| | HyWQ-2. Would the proposed Project substantially reduce or increase the amount of surface water in a water body? | | No applicable Appendix G threshold |
| | HyWQ-3. Would the proposed Project result in a permanent adverse change to the movement of surface water, enough to produce a substantial change in the current or direction of the water flow? | | No applicable Appendix G threshold |
| | HyWQ-4. Would discharges associated with the proposed Project create pollution, contamination, or a nuisance, as defined in Section 13050 of the California Water Code (see definitions on page G.2-4 of the L.A. CEQA | a) Violate any water quality standards or waste discharge requirements <u>or otherwise substantially degrade surface or ground water quality?</u> | These deleted and clarified topics were addressed in the NOP. These changes in language are consistent with the analysis that was done. No action recommended. |

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| | <p>Thresholds Guide), or cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or water quality control plan for the receiving water body?</p> | <p>b) Substantially deplete <u>decrease</u> groundwater supplies or interfere substantially with groundwater recharge such that <u>the project may impede sustainable groundwater management of the basin</u> 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 that would not support existing land uses or planned uses for which permits have been granted)?</p> | <p>Clarification reflect a higher threshold than that evaluated in the NOP, no action recommended</p> |
| | <p>HyWQ-5. Would the proposed Project result in the alteration of a stream or river so that a change in the existing drainage pattern would occur and result in erosion or siltation on-site or off-site?</p> | <p>c) <u>Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would</u></p> <p>i) result in substantial erosion or siltation on- or off-site;</p> <p>ii) <u>substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;</u></p> | <p>Clarifies this threshold and makes it a higher bar. Current analysis likely overstates impacts and is conservative, no action recommended.</p> |

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| | | <p>iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or</p> <p>iv) <u>impede or redirect flood flows?</u></p> | |
| | HyWQ-6. Would the proposed Project result in structures being placed within a 100-year flood hazard area? | <p>d) <u>In flood hazards, tsunami, or seiche zones, risk release of pollutants due to project inundation?</u> Place within a 100-year flood hazard area structures that would impede or redirect flood flows?</p> <p>g) Place housing within a 100-year flood hazard area, as mapped on a Federal Flood Hazard Boundary Map or Flood Insurance Rate Map or other flood hazard delineation map?</p> | Clarifies this threshold and makes it a higher bar. Current analysis likely overstates impacts and is conservative, no action recommended. |
| | HyWQ-7. Would runoff from the proposed Project site exceed the stormwater drainage capacity or degrade water quality? | <p>e) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?</p> <p>e) <u>Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?</u></p> <p>f) Otherwise substantially degrade water quality?</p> | <p>Deletes this threshold. Current analysis likely overstates impacts and is conservative, no action recommended.</p> <p>New threshold. Need to discuss.</p> <p>Addressed above in HyWQ-4 and -7</p> |

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| | | <ul style="list-style-type: none"> i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam? j) Inundation by seiche, tsunami, or mudflow? | Deleted threshold, no action recommended |
| LAND USE AND PLANNING | <p>LU&P-01. Would the proposed Project be consistent with adopted land use goals, objectives, or policies of applicable lands use plans?</p> | <p>b) <u>Cause a significant environmental impact due to a conflict</u> Conflict with any applicable land use plan, policy, or regulation of any agency with jurisdiction over the project (including a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?</p> | <p>Clarification in language is consistent with analysis in current document</p> |
| | <p>Would the proposed Project create incompatible land uses with the immediate surrounding land uses?</p> | | <p>No applicable Appendix G threshold, no action</p> |
| | | <ul style="list-style-type: none"> a) Physically divide an established community? e) Conflict with any applicable habitat conservation plan or natural community conservation plan? | <p>No change to threshold no action Threshold deleted, item for discussion.</p> |
| NOISE | <p>NOI-1: Construction activities lasting more than one day, up to a maximum of 10 days, at a single construction site would exceed existing ambient exterior noise levels by 10 dBA or more at a noise-sensitive receptor. (The noise increase should be assessed for the 8-hour</p> | <p>a) Exposure of persons to or generation <u>Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project</u> in excess of standards established in the local general plan or ordinance or applicable standards of other agencies?</p> | <p>Clarification in language is consistent with analysis in current document</p> |

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| | <p>average noise level [8-hour Leq] for the proposed workday, relative to the baseline ambient over the same time period. Construction noise levels should be assessed at the primary exterior area of frequent human use [such as a patio or back yard] or the façade of habitable portions of the building, whichever is anticipated to receive the highest construction noise levels as a result of the project.) Would the proposed Project result in an interior noise level of 85 dBA Leq (8-hr) to be exceeded and an exterior noise level increase of 10 dBA above the loudest ambient sound level (hourly A-weighted Leq) to be exceeded during construction hours as measured or predicted at the closest occupied space façade of the closest sensitive use?</p> | <p>d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?</p> | <p>Threshold has been deleted. No action recommended</p> |
| | <p>NOI-2: Construction activities lasting more than 10 days in a three-month period at a single construction site would exceed existing ambient exterior noise levels by 5 dBA or more at a noise-sensitive receptor. (The noise increase should be assessed for the 8-hour average noise level [8-hour Leq] for the proposed workday, relative to the baseline ambient over the same time period. Construction noise levels should be assessed at the primary</p> | | |

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| | <p>exterior area of frequent human use [such as a patio or back yard] or the façade of habitable portions of the building, whichever is anticipated to receive the highest construction noise levels as a result of the project.) In terms of potential building damage, would the proposed Project result in ground-borne vibration caused by construction exceeding a velocity of 0.3 ips PPV at the building foundations of the nearest structure?</p> <p>NOI-3: Construction activities would occur within 500 feet of any occupied residential property (including inpatient hospitals, nursing homes, long-term care facilities, etc.) between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 9:00 a.m. or after 6:00 p.m. on any Saturday or national holiday, or at any time on Sunday.</p> <p>In terms of potential human annoyance, would the proposed Project result in ground-borne vibration caused by construction exceeding 0.1 ips PPV at the nearest occupied space of a sensitive use?</p> <p>NOI-4: Construction activities would generate groundborne vibration at any existing building in excess of the guideline building damage criteria provided by Caltrans publication Transportation and</p> | | |

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| | <p>Construction Vibration Guidance Manual, 2013, Table 19 (reproduced above as Table 3.10-2 of this Draft EIR). For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the proposed Project expose people residing or working in the project area to excessive noise levels?</p> | | |
| | <p>NOI-5: Construction activities lasting more than 10 days in a three-month period at a single construction site would generate groundborne vibration at a sensitive receptor in excess of the guideline “strongly perceptible” response criterion provided by the Caltrans publication Transportation and Construction Vibration Guidance Manual, 2013, Table 20 (reproduced above as Table 3.10-3 of this Draft EIR). Vibration levels should be assessed at the closest occupied portion of the sensitive building.</p> | <p>b) Exposure of persons to or Generation of excessive groundborne vibration or groundborne noise levels?</p> | <p>Clarification in language is consistent with analysis in current document</p> |
| | | <p>e) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?</p> | <p>Deleted threshold addressed in NOP – no action recommended</p> |
| | | <p>c) For a project located within an the vicinity of a private airstrip or an</p> | <p>Not addressed in current document – item for discussion.</p> |

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| | | <p>airport land use plan or, where such a plan has not been adopted, within 2 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?</p> | |
| | | <p>f) For a project in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?</p> | |
| PUBLIC SERVICES | <p>PS-1: Would the demand for police and fire protection services anticipated at the time of proposed Project build-out compared to the expected level of service increase, resulting in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities? If so, does the proposed Project include security and/or design features that would reduce the demand for police and fire protection services?</p> | <p>a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:</p> <ul style="list-style-type: none"> • Fire protection? • Police protection • Schools? • Parks? • Other public facilities? | <p>No change to threshold, no effect on document. School, parks, and other public facilities addressed in NOP.</p> |
| RECREATION | | <p>a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical</p> | <p>No change to threshold, no effect on document</p> |

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| | | <p>deterioration of the facilities would occur or be accelerated?</p> <p>b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?</p> | |
| TRANSPORTATION/TRAFFIC | <p>TRAF-1. Temporary Traffic Impacts (L.A. CEQA Thresholds Guide, L.8): Would the proposed Project result in temporary traffic impacts? The determination of significance shall be made on a case-by-case basis, considering temporary Traffic Impacts:</p> <ul style="list-style-type: none"> • The length of time of temporary street closures or closures of two or more traffic lanes; • The classification of the street (major arterial, state highway) affected; • The existing traffic levels and LOS on the affected street segments and intersections; • Whether the affected street directly leads to a freeway on- or off-ramp or other state highway; • Potential safety issues involved with street or lane closures; and • The presence of emergency services | <p>a) Conflict with an applicable program plan, ordinance, or policy establishing measures of effectiveness for addressing the performance of the circulation system, including transit, roadway, bicycle and pedestrian facilities taking into account all modes of transportation, including mass transit and non-motorized travel, and relevant components of the circulation system, including intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?</p> <p>b) <u>Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) Conflict with an applicable congestion management program, including LOS and travel demand measures, or other standards established by the county Congestion Management Agency for designated roads or highways?</u></p> | <p>The use of VMT instead of LOS could apply to the construction vehicles. Item for discussion. Fehr & Peers included VMT language not applicable.</p> |

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| | (fire, hospital, etc.) located nearby that regularly use the affected street. | <p>e) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that would result in substantial safety risks?</p> <p>f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities or otherwise decrease the performance or safety of such facilities?</p> | |
| | <p>TRAF-2. Temporary Los of Access (L.A. CEQA Thresholds Guide, L.8): Would the proposed Project result in the temporary loss of access?</p> <ul style="list-style-type: none"> • The determination of significance shall be made on a case-by-case basis, considering temporary loss of access; • The length of time of any loss of vehicular or pedestrian access to a parcel fronting the construction area; • The availability of alternative vehicular or pedestrian access within ¼ mile of the lost access; and • The type of land uses affected, and related safety, convenience, and/or economic issues. | | <p>Threshold changes are consistent with emphasis on non-traffic impacts. No other action needed.</p> |
| | <p>TRAF-3. Temporary Loss of Bus Stops or Rerouting of Bus Lines (L.A. CEQA</p> | | <p>Threshold changes are consistent with emphasis on non-</p> |

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| | <p>Thresholds Guide, L.8): Would the proposed Project result in the temporary loss of bus stops or the rerouting of bus lines? The determination of significance shall be made on a case-by-case basis, considering temporary loss of Bus Stops or Rerouting of Bus Lines:</p> <ul style="list-style-type: none"> • The length of time that an existing bus stop would be unavailable or that existing service would be interrupted; • The availability of a nearby location (within ¼ mile) to which the bus stop or route can be temporarily relocated; • The existence of other bus stops or routes with similar routes/destinations within a ¼ mile radius of the affected stops or routes; and • Whether the interruption would occur on a weekday, weekend or holiday, and whether the existing bus route typically provides service that/those day(s). | | <p>traffic impacts. No other action needed.</p> |
| | <p>TRAF-4. Safety Hazards (Project-specific Threshold Derived from LA City CEQA Thresholds and CEQA Appendix G): Would the proposed Project result in design features/physical features</p> | <p>c) Substantially increase hazards due to a <u>geometric</u> design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</p> | <p>Clarification in language does not affect analysis – no action recommended.</p> |

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| | <p>that would result in bicycle, pedestrian and vehicular safety hazards? The determination of significance shall be on a case-by-case basis, considering the following Bicycle, Pedestrian and Vehicular Safety factors:</p> <ul style="list-style-type: none"> • The amount of pedestrian activity at project construction sites; • Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers at the project construction site, and the visibility of cars to pedestrians and bicyclists; • The type of bicycle facility adjacent to the project construction site and the level of utilization; and • The physical conditions of the project construction site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle or vehicle/vehicle impacts. | <p>d) Result in inadequate emergency access?</p> | <p>Threshold changes are consistent with emphasis on non-</p> |
| | <p>TRAF-5. Alternative Transportation Plan Conflicts (Project-specific Threshold Derived from</p> | | |

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| | LA City CEQA Thresholds and CEQA Appendix G): Would the project conflict with adopted policies, plans, or programs supporting alternative transportation? | | traffic impacts. No other action needed. |
| TRIBAL CULTURAL RESOURCES | <p>TCR-1: Would the proposed Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <p>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</p> <p>ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of</p> | <p>a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <p>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</p> <p>ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of</p> | No change to threshold, no effect on document |

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| | Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe? | Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | |
| UTILITIES AND SERVICE SYSTEMS | <p>UT-1: Would the total estimated water demand for the proposed Project exceed the existing and planned water supply? To what degree would scheduled water infrastructure improvements or proposed Project design features reduce or offset potential water service impacts associated with water supply?</p> <p>UT-2: Would the proposed Project under built-out conditions be adequately served by the existing and planned water infrastructure? To what degree would scheduled water infrastructure improvements or proposed Project design features reduce or offset potential water service impacts associated with water infrastructure?</p> | <p>a) Require or result in the <u>relocation or construction of new or expanded water or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or the expansion of existing facilities, the construction or <u>relocation</u> of which could cause significant environmental effects?</u></p> <p>b) Have sufficient water supplies available to serve the project <u>and reasonably foreseeable future development during normal, dry and multiple dry years.</u> from existing entitlements and resources, or are new or expanded entitlements needed?</p> | <p>Item for discussion, this clarification addresses more infrastructure than typically addressed.</p> <p>Addressed above in UT-1</p> |

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| | UT-3: Would the proposed Project constrain or exceed the future planned drainage capacity as defined in the City of Los Angeles General Plan? | e) Require or result in the construction of new stormwater drainage facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects? | Addressed above in UT-1 |
| | UT-4: Would the proposed Project's total estimated waste water flow exceed the existing sewer capacity? | a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to existing commitments? | Clarification in language consistent with existing analysis in document. No action recommended. |
| | UT-5: Would the proposed Project conflict with solid waste policies and objectives in the City of Los Angeles Solid Waste Management Policy Plan, Framework Element or the Source Reduction and Recycling Element? | d) <u>Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?</u> | Clarification in language is consistent with analysis in document. No action recommended. |

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| | <p>UT-6: Would the proposed Project result in a need for an additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste? Would the proposed Project under built-out conditions be adequately served by existing waste infrastructure?</p> | <p>e) Comply with federal, state, and local <u>management and statutes-reduction statutes</u> and regulations related to solid waste?</p> | <p>Clarification in language is already addressed in analysis. No action recommended.</p> |
| WILDFIRE | | <p><u>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</u></p> <p>a) <u>Substantially impair an adopted emergency response plan or emergency evacuation plan?</u></p> <p>b) <u>Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?</u></p> <p>c) <u>Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?</u></p> <p>d) <u>Expose people or structures to significant risks, including downslope or downstream flooding or</u></p> | <p>This is a new topic and four new thresholds that have been added to SRP analysis. Action already taken.</p> |

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| | | <p><u>landslides, as a result of runoff, post-fire slope instability, or drainage changes?</u></p> | |
| <p>MANDATORY FINDINGS OF SIGNIFICANCE</p> | | <p>a) Does the project have the potential to <u>substantially</u> 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, <u>substantially</u> 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?</p> <p>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.)</p> <p>c) Does the project have environmental effects that could cause substantial adverse effects on human beings,</p> | <p>Any substantial changes that rise to the level of significance are identified here. This is a higher threshold than considered in the analysis. No action recommended.</p> |

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