

ES.1 Introduction and Background

This Environmental Impact Report (EIR) evaluates the City of Los Angeles' (City) proposed Sidewalk Repair Program (Project) under the California Environmental Quality Act (CEQA). Per CEQA, the City is the lead agency. This executive summary provides an overview of the Project and its environmental effects.

The Project is a Citywide program to modify the manner in which sidewalk repair projects are undertaken pursuant to the City's obligations under the *Willits* Settlement Agreement (Settlement), which includes various City actions that provide improved access to persons with mobility disabilities in accordance with local, state, and federal accessibility requirements. The Project is an infrastructure project and consists of continuation of sidewalk repairs; curb ramp repairs; crosswalk paving; street tree retention, removal and replacement; canopy pruning; root pruning; and applicable utility work for 30 years within the City.

Currently, the City is complying with the Settlement using existing ordinances and policies. The existing process requires case-by-case review and approval of each sidewalk repair project funded as a result of the Settlement. With the Project, the City is proposing to adopt a new ordinance to revise the way sidewalk repairs undertaken pursuant to the *Willits* Settlement are reviewed and approved, with a primary goal of streamlining the Settlement implementation process, including ministerial review of certain individual sidewalk repairs.

Under the Project, impacts in individual construction projects would generally be less than significant, except in: (1) some construction projects where, despite adherence to program design features (PDFs), which include regulatory compliance measures and other standard conditions, impacts would be significant and unavoidable where sensitive uses are in close proximity to certain noise and vibratory sensitive receptors; and (2) rare construction projects where, despite adherence to PDFs, impacts would be significant and unavoidable for certain aesthetic, cultural resources, and tribal cultural resources impacts.

The EIR process, as defined by CEQA, requires preparation of an objective, full-disclosure document to: (a) inform agency decision makers and the general public of the direct and indirect environmental effects of a proposed project; (b) identify, where feasible, mitigation measures to reduce or eliminate any identified significant adverse impacts; and (c) identify and evaluate alternatives to the proposed project that might lessen or avoid some or all of the identified significant impacts of the project.

ES.2 Proposed Project Summary

The Project would consist of adoption of new ordinance that would revise the way individual sidewalk repairs undertaken pursuant to the *Willits* Settlement are reviewed and approved, and would consist of:

1. Specific parameters to enable most sidewalk repairs to proceed as ministerial approvals under CEQA, not subject to further environmental review applicable to discretionary actions. This portion of the ordinance would provide that all sidewalk repair projects under the *Willits*

Settlement are subject to, notwithstanding anything in the City code to the contrary (except for the City of Los Angeles Cultural Heritage Ordinance, City of Los Angeles Administrative Code (LAAC) Section 22.171), a ministerial approval issued by the City Engineer or designee, so long as the individual project meets the following specified parameters:

- a. It is for the repair or reconstruction of a sidewalk or other facilities in compliance with disability law accessibility requirements being implemented under the *Willits* Settlement;
 - b. It is within specific parameters of the construction scenarios for the EIR assessment described in Chapter 2, *Project Description*, Section 2.4.3 (Scenarios 1 and 2), specifically sidewalk repairs lasting no more than 30 non-consecutive construction days in duration and excavation depth of no greater than 30 feet;
 - c. It would not cause a substantial adverse change to significance of a known historic, known tribal cultural, known unique archaeological, or known unique paleontological resource, as those terms are defined by CEQA;
 - d. It complies with the Revised Street Tree Retention, Removal and Replacement Policy for Sidewalk Repair Program, as described more fully in Chapter 2, *Project Description*, Section 2.4.4; and
 - e. It complies with PDFs included in the ordinance, as described in Chapter 3, *Environmental Impact Analysis* and summarized in in Section ES.3 below.
2. A streamlined discretionary approval process under CEQA for sidewalk repair projects falling outside the specific parameters allowed for a ministerial sidewalk repair approval. The new streamlined discretionary approval process would provide that these sidewalk repair sites would be subject to, notwithstanding anything in the City code to the contrary (except for the Cultural Heritage Ordinance, LAAC Section 22.171), a discretionary approval issued by the City Engineer or designee, so long as:
- a. It is for the repair or reconstruction of a sidewalk or other facilities in compliance with the *Willits* Settlement;
 - b. It complies with the Revised Street Tree Retention, Removal and Replacement Policy for the Sidewalk Repair Program as described more fully in Chapter 2, *Project Description*, Section 2.4.4; and
 - c. It complies with the PDFs as described in Chapter 3, *Environmental Impact Analysis* and summarized in Section ES.3 below.

For these discretionary approvals, this EIR would serve as programmatic analysis of the impacts, and further project-level environmental review would be performed as necessary depending on whether the project is within the scope of the EIR pursuant to CEQA Guidelines Section 15168.

3. A Revised Street Tree Retention, Removal and Replacement Policy for the Sidewalk Repair Program, as set forth more fully at Chapter 2, *Project Description*, Section 2.4.4, establishing a 2:1 street tree replacement to removal ratio requirement for the first 10 years (starting from July 2017), a 3:1 ratio for years 11 to 21, and a 2:1 ratio for the last 9 years of the 30-year program; and
4. Mandatory Project Design Features (PDFs), as described in Chapter 3, *Environmental Impact Analysis*, generally consisting of regulatory compliance measures and standard construction conditions, and summarized in Section ES.3 below.

Please see Chapter 2, *Project Description*, for a more detailed description of the Project. Figure ES-1, Project Location Map, shows the location of the Project.

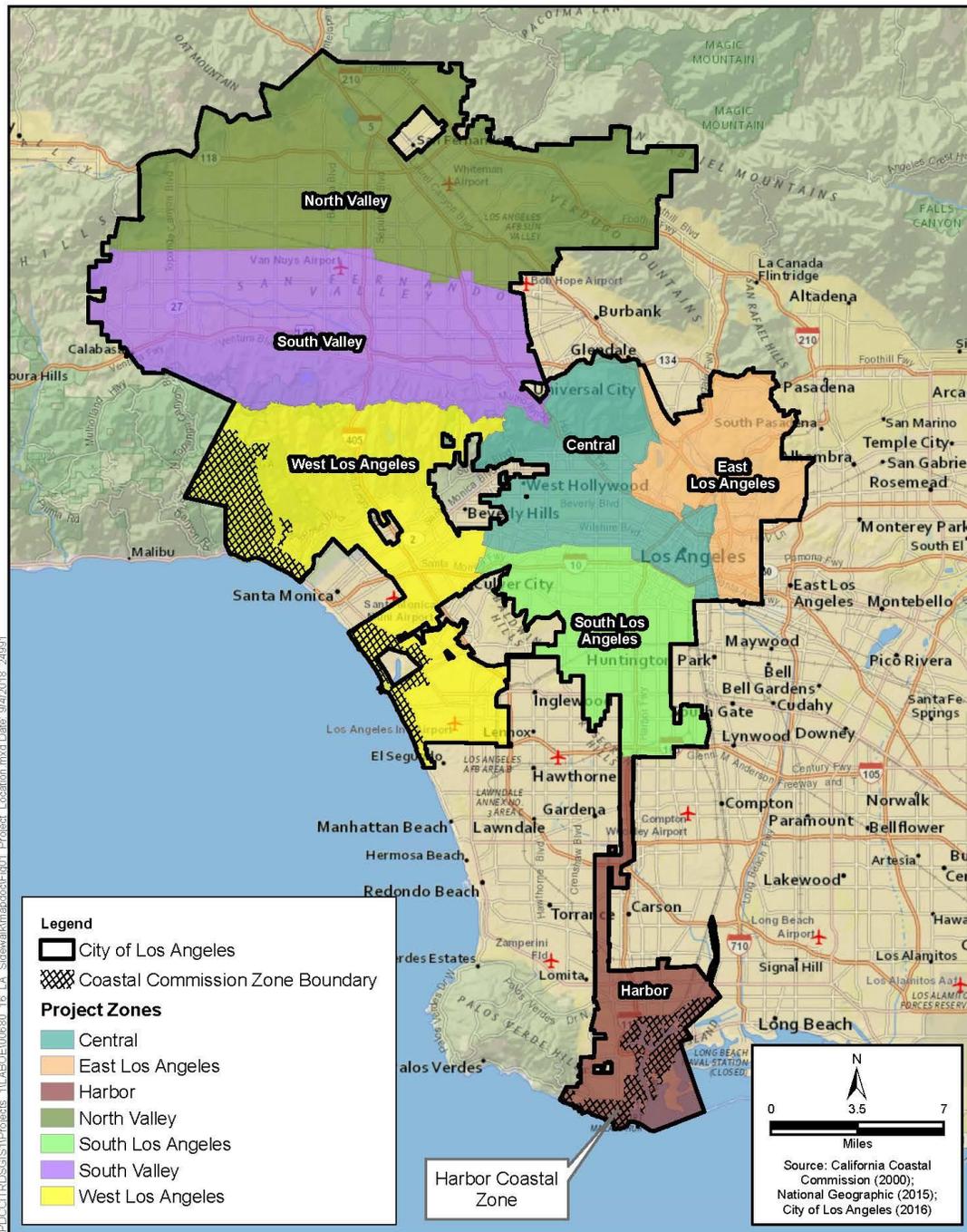


Figure ES-1
Project Location

ES.3 Mandatory Project Design Features

As part of Chapter 3, *Environmental Impact Analysis*, each environmental resource area analysis provides, as applicable, PDFs consisting of regulatory compliance measures and other standard conditions for sidewalk repair construction sites under the Project. These PDFs are summarized below:

BIOLOGY:

PDF-BIO-1: The program will have a 2:1 street tree replacement ratio for years 1–10, 3:1 for years 11–21, and 2:1 for the remaining years of the program. All replacement street trees will be planted within 1 year of removal. See Chapter 2, *Project Description*.

PDF-BIO-2: Prior to being removed, all street trees would be thoroughly surveyed for the presence of nesting birds/bats/raptors by a qualified biologist (or qualified arborist) within 3 days prior to any street tree removal. If any active nests are detected, the area will be flagged, and a minimum 250-foot (500-foot for raptors) non-disturbance buffer would be established (a modification to this buffer would be determined by the monitoring biologist and in consultation with U.S. Fish and Wildlife Service and California Department of Fish and Wildlife), and would be avoided until the nesting cycle has been completed or the monitoring biologist determines that the nest has failed. If nesting birds are found, an avoidance area will be established in consultation with the resource agencies, as appropriate, around the nest until a qualified avian biologist has determined that young have fledged or nesting activities have ceased. The project site will be re-surveyed if there is a lapse in construction activities for more than 7 days during the bird breeding season. A preconstruction nesting bird survey would be submitted at the conclusion of the site survey.

PDF-BIO-3: All street tree removal work would be performed under the management of a Tree Risk Assessment Qualification (TRAC) Certified Urban Forestry Division (UFD) Tree Supervisor, including any pre- and post-pruning street tree inspection. It should be noted that a root-pruning permit would not be necessary for the street tree pruning and root-pruning work under the Project. See Chapter 2, *Project Description*.

PDF-BIO-4: Replacement street trees will be monitored and those which do not survive in the first 3 years would be replaced at a 1:1 ratio. See Chapter 2, *Project Description*.

PDF-BIO-5: Construction activities in or near an Environmental Sensitive Habitat Areas (ESHA) would be pursuant to Public Resources Code (PRC) Sections 30251, 30240, 30230 and 30231 as compliance with the California Coastal Commission. A 50-foot buffer strip for all activities in or near an ESHA (measured from the outer limit of riparian vegetation or, if the waters are estuarian, a minimum of 100 feet from the outer limit of estuarian vegetation) shall be required in new development to protect the habitat value of riparian areas where the opportunity exists.

CULTURAL RESOURCES:

PDF-CUL-1: Prior to any approval of an individual sidewalk repair project under the proposed Project, the project site shall be assessed to determine whether a substantial adverse change would occur to the significance of a historic, tribal cultural, unique archaeological, and/or unique paleontological resource.

PDF-CUL-2: Where an individual sidewalk repair project would cause a substantial adverse change to the significance of a historic resource, the Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, shall be followed.

PDF-CUL-3: Where an individual sidewalk repair project would cause a substantial adverse change to the significance of a unique archaeological resource, the City shall prepare an archaeological treatment plan (ATP) that ensures the long-term protection and proper treatment of archaeological resources of significance. The ATP shall include a monitoring plan, research design, and data recovery plan. The ATP shall be consistent with the Secretary of the Interior's Standards and Guidelines for Archaeological Documentation, California Office of Historic Preservation's (OHP) *Archaeological Resources Management Report*, Recommended Contents and Format (1989), and the *Guidelines for Archaeological Research Design* (1991); and shall also take into account the Advisory Council on Historic Preservation's publication *Treatment of Archaeological Properties: A Handbook*. The ATP shall also be consistent with the Department of the Interior's Guidelines for Federal Agency Responsibility under Section 110 of the National Historic Preservation Act. In addition, those steps outlined in Public Resources Code Sections 21083.2(b) and 21083.2(i) and Section 15064.S(f) of the CEQA Guidelines shall be implemented, as necessary.

PDF-CUL-4: Where an individual sidewalk repair project would cause a substantial adverse change to the significance of a unique paleontological resource, a qualified paleontologist shall be retained by the City to develop an acceptable monitoring and fossil remains treatment plan (Paleontological Management Treatment Plan - PMTP) for construction-related activities that could disturb potential unique paleontological resources within the project area. The selection of the paleontologist and the development of the PMTP shall be subject to approval by the Vertebrate Paleontology Section of the Natural History Museum of Los Angeles County to comply with paleontological requirements, as appropriate.

PDF-CUL-5: Pursuant to the City Engineer Standard Specifications, Section 6-3.2, (Greenbook, 2012), if, during construction activities, an unexpected discovery is made of items of archaeological or paleontological interest, the Contractor shall immediately cease excavation in the area of discovery and shall not continue until ordered by the Engineer. PDF-CUL-3 and PDF-CUL-4 would be followed, as appropriate.

GEOLOGY & SOILS:

PDF-GEO-1: A Shoring Plan may be needed where excavation will be greater than 5 feet to accommodate existing underground utilities, per Section 7-10.4.2.2 of the Shoring Plan of the Los Angeles Bureau of Engineering Standard Specifications for Public Works Construction, or the "Greenbook" (2012). The Shoring Plan must meet the specifications of the most recently adopted Greenbook at the time.

HAZARDS AND HAZARDOUS MATERIALS:

PDF-HAZ-1: For each Project site a database search pursuant to California Government Code Section 65962.5 would be conducted to identify applicability of any regulatory requirements or hazardous material risks associated with the Project site or the adjacent sites.

PDF-HAZ-2: In events of spills, leaks, or other contamination, the protocols pursuant to the *Hazardous Materials Incident Contingency Plan* published by the California Office of Emergency Services would be followed. A checklist for protocol notification to the public agencies can be found in Appendix E1. This would include notification to the City Los Angeles Fire Department (LAFD), who would make recommendations as to which outside agencies, such as Department of Toxic Substances Control (DTSC), Regional Water Quality Control Board (RWQCB), Department of Health Services, etc., would be consulted.

PDF-HAZ-3: If the Project site is on a public right-of-way and contains contaminated soil then work would be Pursuant to the BOE Standard Specification Section No. 02310 *Earthwork* Subsection No. 3.3, *Contaminated Soils*, which specifies the requirements and procedures, including handling and disposing of contaminated soils or debris encountered during site excavations would be implemented.

PDF-HAZ-4: If the Project site on a public right-of-way contains contaminated ground water, BOE Standard Specification Section No. 02235 *Dewatering* would be implemented. This requires National Pollutant Discharge Elimination System (NPDES) permitting, and it also includes Waste Discharge Requirements (WDR) for discharges into the storm drain. If discharged to the sanitary sewer system, an Industrial Waste Permit through the Bureau of Sanitation would be implemented.

HYDROLOGY AND WATER QUALITY:

PDF-HyWQ-1: Pursuant to Section 308-4.9.5-*Watering of the Standard Specification for Public Works Construction "Greenbook,"* all planted areas would be kept moist during the establishment period. When a permanent irrigation system is not available, any temporary system would be used to provide adequate watering during the establishment period without erosion detrimental to planting.

NOISE:

PDF-NOI-1: As feasible during construction, a 10-foot distance between construction equipment and a commercial use sensitive receptor, and a 20-foot distance between construction equipment and residential sensitive receptor should be maintained, per the Los Angeles Zoning Code typical setback distances for these uses.

PDF-NOI-2: As feasible during construction, noise best management practices (BMPs) will be implemented as provided below:

1. Unnecessary idling of internal combustion engines should be strictly prohibited.
2. All equipment should be kept in good repair with all worn, loose and unbalanced machine parts to be replaced.
3. Locate stationary noise-generating equipment such as air compressors or portable power generators as far as possible from neighboring houses.

4. Construction would occur in the daytime hours as allowable by LAMC Section 41.40 - Construction Noise.
5. Notify all adjacent property owners and land users of the construction length, duration, and hours of noise and vibration producing construction activities, in writing.
6. Provide and make available contact information for Sidewalk Repair concerns, on construction activities, prior to and on-site during construction.

PDF-NOI-3: As feasible during construction, vibration BMPs will be implemented as provided below:

1. Use lower powered equipment or techniques such as concrete saws instead of jack hammers, as much as practicable.
2. Minimize the time of use of vibration generating equipment as much as practicable.
3. Notify all adjacent property owners and land users of the construction length, duration, and hours of noise and vibration producing construction activities, in writing.
4. Provide and make available contact information for Sidewalk Repair concerns, on construction activities, prior to and on-site during construction.

TRANSPORTATION/TRAFFIC:

PDF-TR-1: Per the California Manual of Uniform Traffic Control Devices, the construction manager is responsible for ensuring that all work is in full compliance with the current edition of the Work Area Traffic Control Handbook (WATCH) manual, including the requirement of flaggers in Section 9 (Flagger Temporary Traffic Control) for lane closures during street tree removal or other any other construction activity that disrupts the flow of vehicles, pedestrians, or bicyclists.

PDF-TR-2: When construction occurs at an intersection, stopping sight distance would be maintained for vehicles and bicyclists approaching the intersection, per WATCH Flagger Temporary Traffic Control.

PDF-TR-3: Adjacent property owners, whether public or private, would be notified of any upcoming construction. Signage would also be posted in advance of construction, notifying the public of any construction-related lane closures or parking restrictions, in accordance with Section 7-10, Public Convenience and Safety, and Section 302-4.5, Scheduling, Public Convenience and Traffic Control, of the Standard Specifications of Public Works Construction, or the “Greenbook” (2012).

PDF-TR-4: Temporary accessibility-compliant access would be provided and signage would be used, where needed, to direct pedestrians to alternative pedestrian routes or through the use of a temporary walkway, physically separated from vehicle traffic, to provide a more direct detour, in accordance with Section 7-10, Public Convenience and Safety, of the Standard Specifications of Public Works Construction, or the “Greenbook” (2012).

PDF-TR-5: If construction requires a temporary closure of an on-street bicycle facility, signage would be placed to inform drivers and bicyclists of the upcoming bicycle facility closure, indicating a shared lane ahead per WATCH Bicycle Considerations.

PDF-TR-6: If construction requires a temporary closure of an existing transit facility (e.g., bus stop), the project manager shall be responsible for coordinating with the affected transit provider to ensure users are informed of the temporary stop relocations.

PDF-TR-7: Per City's Department of Public Works "Brownbook 7th edition", in Storage of Equipment and Materials, a permit from the Bureau of Street Services shall be obtained before any construction materials or equipment are stored in the public right-of way. All storage of equipment and materials shall be done under approved pollution prevention and erosion control plan as required by California Construction Permit Order No. 2009-009-DWQ.

PDF-TR-8: Truck trips would be coordinated to arrive and depart at off-peak commute times to the extent feasible, pursuant to LAMC Section 62.61.

PDF-TR-9: Any work involving signal disruption would be coordinated with LADOT and the Los Angeles Police Department (LAPD) to identify and implement temporary traffic control needs per the 2012 "Greenbook" Standard Specification for Public Works Construction Section 307-5 et seq., Temporary Street Lighting and Traffic Signal Systems.

WILDFIRE:

PDF-WF-1: The Project Manager is responsible for compliance with applicable LAMC Fire Code Section 57 et seq. for construction sites on, adjacent to or in the immediate vicinity of a Very High Fire Hazard Severity Zone (VHFHSZ) as designated through LAMC Sections 57.4908.1.1 through 57.4908.1.3 and identified on City maintained databases such as NavigateLA and Zone information and Map Access System (Zimas) (which have digitalized LA General Plan and zoning maps).

PDF-WF-2: No person shall travel or trespass upon any firebreak or fire road as stated in Section 57.4908.8.2 of the LAMC.

PDF-WF-3: Pursuant to LAMC Section 57.4908.5 open flame is prohibited upon any road, street, or fire road with the VHFHSZ.

PDF-WF-4: No smoking is allowed where conditions are such as to make smoking a hazard and in spaces where flammable or combustible materials are stored or handled per Section 310.2 of the California Fire Code. Further, it shall be unlawful for any person to light, ignite or smoke any cigar, cigarette, tobacco in a pipe or other form of smoldering substance within VHFHZ compliant with LAMC Section 57.4908.6. The Section also prohibits open flame upon any road, street, or fire road within the VHFHSZ.

PDF-WF-5: No person, except one authorized and acting within the scope of his official duties, shall remove, deface, mar, mutilate, or change the position of any sign, installed by the Chief pursuant to this article, designating "CLOSED AREA," "NO SMOKING," "NO OPEN FIRES," "RESTRICTED ENTRY," or other sign or device installed to give warning and to regulate persons' actions within the VHFHSZ as stated in Section 57.4908.9.1.

PDF-WF-6: Pursuant to Ordinance No. 185789 which added Sections 57.305.5.2, 57.305.5.2.1, 57.322.1.1.10 and 57.322.1.1.10.1, and amended Section 57.322.1.1 to Article 7, Chapter V of the LAMC, the applicable requirements for brush clearing activities in the VHFHSZ would apply including, but not limited to:

- Use of metal cutting blades for grass or brush clearance shall be limited to those which are non-ferrous/non-sparking.
- Brush clearance cannot be done on red flag days, when fire weather conditions are at their peak.
- Individuals engaged in brush clearance operations shall not engage in any other activities during their actual clearance of grass or brush.
- Individuals engaged in grass or brush clearance operations shall use an appropriate extinguishing agent immediately to extinguish a fire.

- All fires, regardless of size, shall be reported immediately via the 9-1-1 system to the Fire Department.
- An approved fire extinguisher, or a pressurized garden hose with attached nozzle shall be within 10 feet of any grass or brush clearance operation, to quickly extinguish a small fire before it burns out of control.
- Where a gasoline container is present at the site of the grass or brush clearance operation, a minimum 4A 60 BC dry chemical fire extinguisher shall be within 10 feet of the brush clearance operation.
- A cell phone capable of dialing 9-1-1 shall be charged and readily accessible to the grass or brush clearance operation.
- A safety strap shall be used at all times for any tool or appliance with hot exhaust. Hot exhaust shall not come in contact with any brush, grass, flash fuels, or other flammable material.

ES.4 Project Objectives

The underlying purpose of the Project is to ensure compliance with the *Willits* Settlement and streamline review of sidewalk repair projects consistent with applicable accessibility standards. The following is a list of objectives for the Project that support the underlying purpose, including the fundamental project objective which is to:

- Ensure the continued and efficient compliance with the requirements of the *Willits* Settlement while amending the existing program for sidewalk and curb ramp improvements within the City, in accordance with the applicable accessibility requirements, including those required by the Americans with Disabilities Act.

The following additional project objectives have also been identified:

- Retain existing street trees that are the cause of sidewalk barriers to the extent feasible, and provided the sidewalk improvements would not result in street tree mortality or compromise public safety;
- If the removal of one or more street trees is required, ensure compliance with the City's replacement requirements adopted to ensure no net street tree canopy loss at the end of the Project implementation period.
- Identify the criteria and process for ministerial approval of future sidewalk improvements and street tree removals and replacements, with the goal of avoiding the need to undertake individualized environmental review of every repair of every City sidewalk or of every street tree removal and replacement and the potential legal challenge to each such approval; thereby streamlining the *Willits* Settlement implementation and providing certainty to the City and the disability community.

ES.5 Required Project Approvals

This Draft EIR is both a project EIR which considers the potential effects of the new City ordinance governing sidewalk repairs under the *Willits* Settlement (CEQA Guidelines Section 15161) for those individual projects which meet the specified parameters, and a program EIR (CEQA Guidelines Section 15168), for purposes of considering the effects of implementation of the Project and

whether future activities fall within the scope of the impacts analyzed in the EIR for those individual projects that do not meet the specified parameters.

Certification of the final EIR would be required prior to approval of the ordinance. The City is the lead agency for the Project. Implementation of the Project may require discretionary actions and permits from the agencies identified in Table ES-1.

Table ES-1. Anticipated Permits and Approvals for Project

| Agency | Permit/Approval | Issue |
|--|--|--|
| Local | | |
| City of Los Angeles, City Council | CEQA document and proposed ordinance | Certification of the EIR and related findings. Ordinance would govern implementation for all Project activities over the next approximately 30 years |
| City of Los Angeles, Department of Public Works, Bureau of Engineering | Local Coastal Development Permit | City will obtain any required local coastal approvals in a coastal zone for Project activities. |
| Regional | | |
| Los Angeles Regional Water Quality Control Board | National Pollutant Discharge Elimination System Construction Stormwater Pollution Prevention Plan Permit | Water quality and the placement of discharges associated with dewatering activities, if required; no permit required for discharges to sewer (general permit may be used). |
| State | | |
| California Coastal Commission | State Coastal Development Permit or other approval | City will obtain any required local coastal approvals in a coastal zone for Project activities. |

ES.6 Comments Received on the Notice of Preparation

A Notice of Preparation (NOP) and Initial Study were circulated from July 27, 2017 to September 15, 2017. During this extended 45-day review period, the lead agency requested comments on the scope and content of the environmental information to be included in the Draft EIR.

Copies of the NOP/IS were made available for review at 35 library locations and mailed to more than 500 governmental and agency stakeholders. There were six digital announcements sent to approximately 567 email addresses constituting of community residents, stakeholders, and interested constituents from NOP/IS process, public agencies, non-profit groups, etc. were sent during the extended 45-day public review period. Electronic advertisements on the public meetings and the Project were in Facebook, EmpowerLA, Los Angeles Sentinel, La Opinion (digital), and LA Times (digital). Public notices were printed in Los Angeles Times, Daily Breeze, and La Opinion newspapers. Staff attended 11 neighborhood council meetings prior to the end of the scoping period to invite stakeholders to comment on the NOP and attend the scoping meetings. All 15 City of Los Angeles Council Offices were contacted to post announcements about the environmental review process via their communications channels, and 9 council offices posted announcements. Three public scoping meetings were held to obtain input on the NOP/IS and the scope and contents of the EIR:

- August 9, 2017, 6 p.m.–8 p.m., Ronald F. Deaton Civic Auditorium, 100 W 1st St (Main), Los Angeles, CA 90012
- August 14, 2017, 6 p.m.–8 p.m., Mid-Valley Senior Citizen Center, 8825 Kester Ave, Panorama City, CA 91402
- August 24, 2017, 6 p.m.–8 p.m., Westchester Senior Citizen Center, 8740 Lincoln Boulevard, Los Angeles, CA 90045

Public comments submitted during the scoping period expressed concerns regarding the following issues:

- Aesthetics
- Air Quality
- Biological Resources
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Noise and Vibration

The NOP/IS and public comments are also included in Appendix A1 and A2. A summary of public outreach conducted during the NOP/IS scoping period is included in Appendix A3 of this EIR.

ES.7 Summary of Environmental Impacts

ES.7.1 Effects Found Not to Be Significant

In the IS, the City determined that the Project would result in no impact for the following resource areas and, therefore, eliminated them from further analysis in the Draft EIR:

- Agriculture and Forestry Resources
- Mineral Resources
- Population and Housing
- Recreation

The analyses presented in Chapter 3, *Environmental Impact Analysis*, concluded that the Project would result in a less-than significant impact, without any required mitigation, for the following resource areas:

- Aesthetics (Scenarios 1 and 2 Construction projects only; see Chapter 2, *Project Description*, for a discussion of the construction scenarios)
- Air Quality
- Biological Resources
- Cultural Resources (Scenarios 1 and 2 Construction projects only; see Chapter 2, *Project Description*, for a discussion of the construction scenarios)
- Energy
- Geology and Soils

- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Public Services
- Recreation
- Transportation/Traffic
- Tribal Cultural Resources (Scenarios 1 and 2 Construction projects only; see Chapter 2, *Project Description*, for a discussion of the construction scenarios)
- Utilities and Service Systems
- Wildfire Hazards

ES.7.2 Significant and Unavoidable Adverse Impacts

The analyses presented in Chapter 3, *Environmental Impact Analysis*, concluded that the Project would result in significant and unavoidable adverse impacts, with no feasible mitigation, for the following resource areas:

- Aesthetics (Scenario 3 only) – Significant and unavoidable adverse impacts to aesthetics would occur in Scenario 3 construction projects where *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* (SOI Standards) cannot be fully implemented and a historic resource is demolished, destroyed, or damaged in such a way that its integrity and importance is impacted.
- Cultural Resources (Scenario 3 only) - Significant and unavoidable adverse impacts to historical, archeological, and paleontological resources would occur in Scenario 3 construction projects where despite the implementation of SOI Standards, archaeological treatment plans (ATPs), and paleontological management treatment plans, the significance of the historical, archaeological, and/or paleontological resource cannot be maintained.
- Noise - Significant and unavoidable adverse impacts related to construction noise and construction vibration would occur in the limited instances where: a 10-foot distance for commercial sensitive receptors and a 20-foot distance for residential sensitive uses cannot be maintained from the construction noise source; an 8-foot distance cannot be maintained from the closest occupied space façade of the closest sensitive receptor; and/or a 23-foot distance cannot be maintained from the vibratory equipment to the nearest occupied space of a sensitive receptor.
- Tribal Cultural Resources (Scenario 3 only) - Significant and unavoidable adverse impacts to tribal cultural resources would occur in Scenario 3 construction projects where despite the implementation of SOI Standards and ATPs, the significance of the tribal cultural resource cannot be maintained.

ES.8 Cumulative Impacts

Based on the analysis included in the Draft EIR in Chapter 3.17, *Cumulative Impacts*, the Project would result in the following cumulatively considerable impacts.

Aesthetics

- Under Scenario 3, impacts on HCM street trees or other historic street trees within the public right-of-way may occur; therefore, the Project would result in a cumulatively considerable contribution to a cumulatively significant aesthetic impact.

Cultural Resources

- The Project would contribute to significant cumulative cultural resource impacts (historical and paleontological) to a cumulatively considerable degree.

Tribal Cultural Resources

- Through the consultation process with area tribes, mutual agreement could not be reached as to whether a significant effect exists and/or any measures to mitigate or avoid a significant effect on TCRs. Therefore, the Project would result in a cumulatively considerable contribution to a significant cumulative impact on TCRs.

ES.9 Summary of Environmental Impacts of the Project

Table ES-2 at the end of this Executive Summary contains a summary of impacts by environmental resource area. The following are provided for each impact: the significance determination before mitigation, required mitigation measures (if any), and any remaining impacts after the implementation of mitigation.

ES.10 Summary of Project Alternatives Analysis

The City considered several alternatives to the proposed Project during the development of this Draft EIR for the proposed Project. Potential alternatives were developed to identify means other than the proposed Project to attain key project objectives while lessening or avoiding potentially significant environmental impacts caused by the proposed Project. Scoping comments received for this EIR inform the identification and development of alternatives to the proposed Project.

ES.10.1 Alternatives Considered

Based on initial consideration, the following represent a reasonable range of alternatives to the proposed Project and have been identified by the City for consideration in this EIR. A detailed description of each of these is provided in Chapter 5, Comparison of Alternatives.

- No Project Alternative.
- Alternative 1. Ordinance to repair sidewalks and avoid removal of any street trees.
- Alternative 2. Ordinance to exclude sidewalk repairs and street tree removals within 23 feet of the nearest occupied space façade of the closest sensitive receptor (residential or commercial use).
- Alternative 3. Ordinance will exclude sidewalk repair projects that have the potential to affect known historic, tribal cultural, unique archaeological, or unique paleontological resources; such projects would proceed as discretionary projects under existing codes and policies.

- Alternative 4. The City will expend accelerate its annual funding commitment(s) in sidewalk repair funds pursuant to the Willits Settlement in 15 years rather than the Settlement's 30-year compliance period.
- Alternative 5. Ordinance to require use of only hand tools, for example, no jackhammering, no power tools, and no heavy equipment.
- Alternative 6. Avoid sidewalk repairs and street tree removals that would last longer than 30 construction days or require excavation greater than 30 feet.
- Alternative 7. Ordinance to obtain ROW acquisition of private property to retain all street trees by meandering sidewalks and to place a construction noise barrier.
- Alternative 8. Ordinance to mandate/test use of alternative/green/recycled construction materials for sidewalk and curb ramp repairs, where applicable.
- Alternative 9. Ordinance to include revision to the current BPW street tree policy for a higher than 2:1 street tree replacement to removal ratio.

ES.10.2 Alternatives Rejected From Further Consideration

Pursuant to State CEQA Guidelines §15126.6(c), an EIR need not carry forward and analyze all alternatives considered and may eliminate alternatives from detailed consideration in the EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid any significant environmental effects. However, the lead agency must briefly explain the reasons underlying the lead agency's determination for rejecting some alternatives. As discussed in Section 5.3, Alternatives 4 through 9 have been not been carried forward for full analysis in this EIR.

ES.10.3 Summary Analysis of Alternatives Carried Forward

The following table ES-2 provides a comparative analysis of the impacts associated with each of the alternatives carried forward (No Project Alternative and Alternatives 1, 2, and 3) relative to the proposed Project. Additional detailed analysis is provided in Chapter 5, Comparison of Alternatives.

Table ES-2. Comparison of Impacts for Alternatives Carried Forward

| Environmental Resource | Proposed Project | No Project Alternative | Alternative 1 | Alternative 2 | Alternative 3 |
|--|-------------------------|-------------------------------|---|----------------------------|----------------------------|
| <i>Aesthetics</i> | Significant | Significant + | Significant - | Significant = | Significant = |
| <i>Air Quality</i> | Less than Significant | Less than Significant = | Less than Significant Significant - | Less than Significant = | Less than Significant = |
| <i>Biological Resources</i> | Less than Significant | Less than Significant + | Less than Significant Significant - | Less than Significant = | Less than Significant = |
| <i>Cultural Resources</i> | Significant | Significant = | Significant = | Significant = | Less than Significant - |
| <i>Energy</i> | Less than Significant | Less than Significant + | Less than Significant Significant - | Less than Significant = | Less than Significant = |
| <i>Geology and Soils</i> | Less than Significant | Less than Significant = | Less than Significant Significant = | Less than Significant = | Less than Significant = |
| <i>Greenhouse Gas Emissions</i> | Less than Significant | Less than Significant + | Less than Significant Significant - | Less Than Significant = | Less than Significant = |
| <i>Hazards and Hazardous Materials</i> | Less than Significant | Less than Significant = | Less than Significant Significant = | Less than Significant = | Less than Significant = |
| <i>Hydrology and Water Quality</i> | Less than Significant | Less than Significant = | Less than Significant Significant = | Less than Significant = | Less than Significant = |
| <i>Land Use and Planning</i> | Less than Significant | Less than Significant = | Less than Significant Significant + | Less than Significant = | Less than Significant = |
| <i>Noise</i> | Significant | Significant = | Significant - | Less Than Significant - | Significant = |

| Environmental Resource | Proposed Project | No Project Alternative | Alternative 1 | Alternative 2 | Alternative 3 |
|--------------------------------------|-------------------------|-------------------------------|----------------------------|----------------------------|----------------------------|
| <i>Public Services</i> | Less than Significant | Less than Significant = | Less than Significant - | Less than Significant = | Less than Significant = |
| <i>Transportation</i> | Less than Significant | Less than Significant = | Less than Significant - | Less than Significant = | Less than Significant = |
| <i>Tribal Cultural Resources</i> | Significant | Significant = | Significant = | Significant = | Less than Significant - |
| <i>Utilities and Service Systems</i> | Less than Significant | Less than Significant = | Less than Significant - | Less than Significant = | Less than Significant = |
| <i>Wildfire Hazards</i> | Less than Significant | Less than Significant = | Less than Significant = | Less than Significant = | Less than Significant = |
| Relative Impact Score | | +4 | -8 | -1 | -2 |

Notes: The + (plus) and - (minus) indicate relative comparison of impacts to the proposed Project.

(+) = Alternative would increase impact when compared with the proposed Project.

(-) = Alternative would reduce impact when compared with the proposed Project.

(=) = Alternative would have similar impacts when compared with the proposed Project and would be considered neutral.

Alternative 1 is the environmentally superior alternative due to the implementation of an ordinance that would streamline sidewalk repairs and avoid all street tree removals. Under this alternative, less sidewalk would be repaired than under the Project because not all sidewalks can be made compliant with accessibility requirements pursuant to the *Willits* Settlement without removal of street trees. In addition, because there would be no street tree removals or replacements, associated operations activities of new street tree monitoring and watering would not be required. Therefore, overall construction activities would be reduced and no street trees would be removed under Alternative 1. Accordingly, impacts related to aesthetics, air quality, biological resources, GHG emissions, noise, public services, transportation, utilities, and energy would be less under Alternative 1 than the proposed Project. Alternative 1 would not meet the Project objectives of ensuring continued and efficient compliance with the requirements of the *Willits* Settlement, in accordance with the applicable accessibility requirements, because some sidewalks would require street tree removals to achieve compliance with applicable accessibility requirements pursuant to the *Willits* Settlement.

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Table ES-3. Summary of Impacts, Project Design Features, and Mitigation Measures

| Environmental Impact | Significance before Mitigation | Mitigation Measures | Significance after Mitigation |
|---|--|---------------------------------|--|
| Chapter 3.0, Section 3.1, Aesthetics | | | |
| AES-1: Would the proposed Project substantially damage or degrade a designated scenic vista or state scenic highway? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| 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? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| 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? | Less than significant (Construction Scenarios 1 and 2) Significant (Construction Scenario 3) No impact (operation) | No feasible mitigation measures | Less than significant (Construction Scenarios 1 and 2) Significant (Construction Scenario 3) No impact (operation) |
| 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? | Less than significant (Construction Scenarios 1 and 2) Significant (Construction Scenario 3) No impact (operation) | No feasible mitigation measures | Less than significant (Construction Scenarios 1 and 2) Significant (Construction Scenario 3) No impact (operation) |
| AES-5: Would the proposed Project result in a substantial loss of shading as a result of street tree retention, removal or replacement throughout the project buildout? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| Chapter 3.0, Section 3.2, Air Quality | | | |
| AQ-1: Would the proposed Project conflict with or obstruct implementation of the SCAQMD AQMP? | Less than significant (construction and operation) | No mitigation measures required | Not applicable |
| AQ-2: Would the proposed Project generate air pollutant emissions during construction activities of sufficient quantity to exceed the Air Quality Significance Thresholds established by the SCAQMD? | Less than significant (construction and operation) | No mitigation measures required | Not applicable |
| 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? | Less than significant (construction and operation) | No mitigation measures required | Not applicable |
| AQ-4: Would the proposed Project expose sensitive receptors to substantial TAC concentrations? | Less than significant (construction and operation) | No mitigation measures required | Not applicable |
| Chapter 3.0, Section 3.3, 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? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| 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? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| 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? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| BIO-4: Would the proposed Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| 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? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| BIO-6: Would the proposed Project conflict with the provisions of an adopted local street tree preservation policy or ordinance? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| 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? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |

| Environmental Impact | Significance before Mitigation | Mitigation Measures | Significance after Mitigation |
|--|--|---------------------------------|--|
| Chapter 3.0, Section 3.4, 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? | Less than significant (Construction Scenarios 1 and 2) Significant (Construction Scenario 3) No impact (operation) | No feasible mitigation measures | Less than significant (Construction Scenarios 1 and 2) Significant (Construction Scenario 3) No impact (operation) |
| CUL-2: Would the proposed Project result in relocation that does not maintain the integrity and significance of a significant historical resource? | Less than significant (Construction Scenarios 1 and 2) Significant (Construction Scenario 3) No impact (operation) | No feasible mitigation measures | Less than significant (Construction Scenarios 1 and 2) Significant (Construction Scenario 3) No impact (operation) |
| 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? | Less than significant (Construction Scenarios 1 and 2) Significant (Construction Scenario 3) No impact (operation) | No feasible mitigation measures | Less than significant (Construction Scenarios 1 and 2) Significant (Construction Scenario 3) No impact (operation) |
| CUL-4: Would the proposed Project disturb, damage, or degrade an archaeological resource, or its setting, that is found to be important because it: 1. Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory; 2. Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions; 3. Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind; 4. Is at least 100 years old and possesses substantial stratigraphic integrity; or 5. Involves important research questions that historical research has shown can be answered only with archaeological methods? | Less than significant (Construction Scenarios 1 and 2) Significant (Construction Scenario 3) No impact (operation) | No feasible mitigation measures | Less than significant (Construction Scenarios 1 and 2) Significant (Construction Scenario 3) No impact (operation) |
| 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? <i>LA CEQA Thresholds Guide.</i> | Less than significant (Construction Scenarios 1 and 2) Significant (Construction Scenario 3) No impact (operation) | No feasible mitigation measures | Less than significant (Construction Scenarios 1 and 2) Significant (Construction Scenario 3) No impact (operation) |
| CUL-6: Would the proposed Project cause disturbance of human remains, including remains interred outside of formal cemeteries? | Less than significant (Construction Scenarios 1 and 2) Significant (Construction Scenario 3) No impact (operation) | No feasible mitigation measures | Less than significant (Construction Scenarios 1 and 2) Significant (Construction Scenario 3) No impact (operation) |
| Chapter 3.0, Section 3.5, Geology & Soils | | | |
| GEO-1: Would the proposed Project cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or directly or indirectly cause 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? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| 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? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| GEO-3: Would the proposed Project constitute a geologic hazard to other properties by causing or accelerating instability from erosion? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| 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? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| 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? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |

| Environmental Impact | Significance before Mitigation | Mitigation Measures | Significance after Mitigation |
|---|---|---------------------------------|-------------------------------|
| Chapter 3.0, Section 3.6, Greenhouse Gas Emissions | | | |
| GHG-1: Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment? | Less than significant (construction and operation) | No mitigation measures required | Not applicable |
| GHG-2: Conflict with any applicable plan, policy, regulation, or recommendation of an agency adopted for the purpose of reducing emissions of GHGs? | Less than significant (construction and operation) | No mitigation measures required | Not applicable |
| Chapter 3.0, Section 3.7, Hazards & Hazardous Materials | | | |
| 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 handling in such a way as to involve the release of hazardous materials into the environment? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| HAZ-2: Would the proposed Project emit/handle/involve hazardous materials and/or waste within one-quarter mile of an existing or proposed school? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| 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? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| HAZ-4: Would the proposed Project hinder or impair an adopted emergency response or evacuation plan or route? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| Chapter 3.0, Section 3.8, Hydrology & 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? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| HyWQ-2: Would the proposed Project substantially reduce or increase the amount of surface water in a water body? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| 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? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| 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 <i>L.A. CEQA Thresholds Guide</i>), 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? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| 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? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| HyWQ-6: Would the proposed Project result in structures being placed within a 100-year flood hazard area? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| HyWQ-7: Would runoff from the proposed Project site exceed the stormwater drainage capacity or degrade water quality? | Less than significant (construction) No impact (operation) | No mitigation measures required | Not applicable |
| Chapter 3.0, Section 3.9, Land Use & Planning | | | |
| LU&P-01: Would the proposed Project be consistent with adopted land use goals, objectives, or policies of applicable lands use plans? | Less than significant (construction and operation) | No mitigation measures required | Not applicable |
| LU&P-02: Would the proposed Project create incompatible land uses with the immediate surrounding land uses? | Less than significant (construction and operation) | No mitigation measures required | Not applicable |

| Environmental Impact | Significance before Mitigation | Mitigation Measures | Significance after Mitigation |
|--|--|---------------------------------|--|
| Chapter 3.0, Section 3.10, Noise and Vibration | | | |
| NOI-1: Would the proposed Project exceed an interior noise level of 85 dBA L_{eq} (8-hr) and result in an exterior noise level increase of 10 dBA above the loudest ambient sound level (hourly A-weighted L_{eq}) during construction hours as measured or predicted at the closest occupied space façade of the closest sensitive use? | Significant related to construction noise in the limited instances where a 10-foot distance for commercial sensitive receptors and a 20-foot distance for residential sensitive uses cannot be maintained from the construction noise source | No feasible mitigation measures | Significant related to construction noise in the limited instances where a 10-foot distance for commercial sensitive receptors and a 20-foot distance for residential sensitive uses cannot be maintained from the construction noise source |
| NOI-2: 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? | Significant related to construction vibration in the limited instances where an 8-foot distance cannot be maintained from the closest occupied space façade of the closest sensitive receptor | No feasible mitigation measures | Significant related to construction vibration in the limited instances where an 8-foot distance cannot be maintained from the closest occupied space façade of the closest sensitive receptor |
| NOI-3: 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? | Significant related to construction vibration in the limited instances where a 23-foot distance cannot be maintained from the vibratory equipment to the nearest occupied space of a sensitive receptor | No feasible mitigation measures | Significant related to construction vibration in the limited instances where a 23-foot distance cannot be maintained from the vibratory equipment to the nearest occupied space of a sensitive receptor |
| NOI-4: 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? | Less than significant | No mitigation measures required | Not applicable |
| Chapter 3.0, Section 3.11, Public Services | | | |
| PS-1: Would the demand for police services at the time of the proposed Project build-out compared to the expected level of service available result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities? | Less than significant (construction and operation) | No mitigation measures required | Not applicable |
| PS-2: Would the Project require the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service? | Less than significant (construction and operation) | No mitigation measures required | Not applicable |
| Chapter 3.0, Section 3.12, Transportation/Traffic | | | |
| TR-1: Would the proposed Project result in temporary traffic constraints due to construction? The determination of significance shall be made on a case-by-case basis, considering the following factors: <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 congestion levels 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 (fire, hospital, etc.) located nearby that regularly use the affected street. | Less than significant (construction) | No mitigation measures required | Not applicable |
| TR-2: Would the proposed Project result in the temporary loss of access due to construction? The determination of significance shall be made on a case-by-case basis, considering the following factors: <ul style="list-style-type: none"> The length of time of any loss of pedestrian or bicycle circulation past a construction area; The length of time of any loss of vehicular, bicycle, or pedestrian access to a parcel fronting the construction area; The length of time of any loss of ADA pedestrian access to a transit station, stop, or facility; | Less than significant (construction) | No mitigation measures required | Not applicable |

| Environmental Impact | Significance before Mitigation | Mitigation Measures | Significance after Mitigation |
|--|--|---------------------------------|--|
| <ul style="list-style-type: none"> The availability of nearby 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>TR-3: Would the proposed Project result in the temporary loss of bus stops or the rerouting of bus lines due to construction? The determination of significance shall be made on a case-by-case basis, considering the following factors:</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). | Less than significant (construction) | No mitigation measures required | Not applicable |
| <p>TR-4: Would the proposed Project conflict or be inconsistent with CEQA Guidelines Section 15064.3(b)(2) by substantially inducing additional automobile travel due to operations?</p> | Less than significant (operation) | No mitigation measures required | Not applicable |
| <p>TR-5: Would the proposed Project negatively affect residential streets due to operations?</p> | Less than significant (operation) | No mitigation measures required | Not applicable |
| Chapter 3.0, Section 3.13, 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> <ol style="list-style-type: none"> 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 A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe? | Less than significant (Construction Scenarios 1 and 2) Significant (Construction Scenario 3) No impact (operation) | No feasible mitigation measures | Less than significant (Construction Scenarios 1 and 2) Significant (Construction Scenario 3) No impact (operation) |
| Chapter 3.0, Section 3.14, Utilities | | | |
| <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> | Less than significant (construction and operation) | No mitigation measures required | Not applicable |
| <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> | Less than significant (construction and operation) | No mitigation measures required | Not applicable |
| <p>UT-3: Would the proposed Project constrain or exceed the future planned drainage capacity as defined in the City of Los Angeles General Plan?</p> | Less than significant (construction and operation) | No mitigation measures required | Not applicable |
| <p>UT-4: Would the proposed Project's total estimated waste water flow exceed the existing sewer capacity?</p> | Less than significant (construction and operation) | No mitigation measures required | Not applicable |
| <p>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?</p> | No impact (construction and operation) | No mitigation measures required | Not applicable |

| Environmental Impact | Significance before Mitigation | Mitigation Measures | Significance after Mitigation |
|--|--|----------------------------------|--------------------------------------|
| 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? | Less than significant (construction and operation) | No mitigation measures required | Not applicable |
| Chapter 3.0, Section 3.15, Energy | | | |
| EN-1: Would the proposed Project result in the wasteful, inefficient, or unnecessary consumption of energy? | Less than significant (construction and operation) | No mitigation measures required | Not applicable |
| Chapter 3.0, Section 3.16, Wildfire | | | |
| WF-1: Substantially impair an adopted emergency response plan or emergency evacuation plan? | Less than significant (construction and operation) | No mitigation measures required | Not applicable |
| WF-2: Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | Less than significant (construction and operation) | No mitigation measures required | Not applicable |
| WF-3: Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | Less than significant (construction and operation) | No mitigation measures required | Not applicable |
| WF-4: Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | Less than significant (construction and operation) | No mitigation measures required | Not applicable |
| Chapter 4.0, Cumulative Impacts | | | |
| Aesthetics - Under Scenario 3, impacts on HCM street trees or other historic street trees within the public right-of-way may occur; therefore, the Project would result in a cumulatively considerable contribution to a cumulatively significant aesthetic impact. | Significant | No feasible mitigation available | Significant contribution |
| Cultural Resources - The Project would contribute to significant cumulative cultural resource impacts (historical and paleontological) to a cumulatively considerable degree. | Significant | No feasible mitigation available | Significant contribution |
| Tribal Cultural Resources - Through the consultation process with area tribes, mutual agreement could not be reached as to whether a significant effect exists and/or any measures to mitigate or avoid a significant effect on TCRs. Therefore, the Project would result in a cumulatively considerable contribution to a significant cumulative impact on TCRs. | Significant | No feasible mitigation available | Significant contribution |