Final Initial Study/ Mitigated Negative Declaration

Pio Pico Library Pocket Park & Underground Parking Structure Project

December 2019

City of Los Angeles

Bureau of Engineering
Environmental Management Group

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

MITIGATED NEGATIVE DECLARATION

(Article I, City CEQA Guidelines)

LEAD AGENCY AND ADDRESS:	City of Los Angeles c/o Los Angeles City Engineer 1149 Broadway, Suite 600 Los Angeles, CA 90015-2213	**COUNCIL DISTRICT 10**
PROJECT TITLE: PIO PICO LIBRARY POCKET PARK & UNDERGROUND PARKING STRUCTURE PROJECT (W.O. E1908188)		**T.G.** 633-H3

PROJECT LOCATION: The project is located at 694 South Oxford Avenue in Council District 10 in the Koreatown area of the Wilshire community plan area in the City of Los Angeles.

DESCRIPTION: The proposed Project involves the construction and operation of a new pocket park and underground parking structure on the site of the existing surface parking lot serving the Pio Pico Koreatown Library. The proposed Project would incorporate the western façade of the existing library into the park, providing some external façade finishings, window/window seat, and a shade trellis. Additionally, minor repairs to the other façades of the existing library would be performed, including cleaning, window updates, surface repairs, and re-touching, where needed. The proposed parking structure would accommodate approximately 50 parking spaces in one subterranean level. It is anticipated that the parking structure would be operational during the same hours that the Pio Pico Koreatown Public Library is open to the public. The proposed pocket park would be located at the ground level in the footprint of the existing surface parking lot. The parking structure would include a City of Los Angeles Recreation and Parks (LARAP) shop area to conduct small repairs to park facilities and store tools. A parking attendant office would also be included. Proposed park elements include a multi-purpose event area to accommodate public events, such as performances, fairs, reading, etc.; a playground; a shade structure; a fitness area; a walking loop; and benches and tables. Landscaped elements would be provided throughout the park and would include trees, shrubs and planter areas. Approximately 75 bicycle parking spaces would be provided along the northern boundary of the Project site and approximately 21 bicycle parking spaces along the southern boundary at 7th Street. The proposed Project also involves the conversion of the 12 existing parallel street parking spots adjacent to the library to approximately 17 angled parking spots on 7th Street and 11 angled parking spots on Serrano Avenue. Additionally, to provide adequate facilities for the anticipated users of the park and existing library, the restroom facilities within the library would be expanded and upgraded, which requires minor modifications internal to the existing restroom facilities.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY:

FINDING: The **City Engineer** of the City of Los Angeles has determined the proposed project will not have a significant effect on the environment. See attached Initial Study.

SEE THE ATTACHED PAGES FOR ANY MITIGATION MEASURES IMPOSED

Any written objections received during the public review period are attached, together with the responses of the lead City agency.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED

PERSON PREPARING THIS FORM: Talmage Maxwell Jordan Environmental Scientist II	**ADDRESS:** 1149 S. Broadway, Suite 600, MS 939 Los Angeles, CA 90015	**TELEPHONE NUMBER:** (213) 485-5754
SIGNATURE (Official): M E Martin Maria Martin, Environmental Affairs Officer Environmental Management Group		**DATE:** November 26, 2019

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FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Pursuant to the California Environmental Quality Act (Division 13, Public Resources Code)

Proposed Project

The City of Los Angeles (City) and City of Los Angeles Department of Public Works, Bureau of Engineering (BOE) are proposing the construction and operation of a new pocket park and underground parking structure on the site of the existing surface parking lot serving the Pio Pico Koreatown Library (proposed Project). The proposed Project would incorporate the western façade of the existing library into the park, providing some external façade finishings, window/window seat, and a shade trellis. Additionally, minor repairs to the other façades of the existing library would be performed, including cleaning, window updates, surface repairs, and re-touching, where needed. The proposed parking structure would accommodate approximately 50 parking spaces in one subterranean level. It is anticipated that the parking structure would be operational during the same hours that the Pio Pico Koreatown Library is open to the public. The proposed pocket park would be located at the ground level in the footprint of the existing surface parking lot. The parking structure would include a City of Los Angeles Recreation and Parks (LARAP) shop area to conduct small repairs to park facilities and store tools. A parking attendant office would also be included. Proposed park elements include a multi-purpose event area to accommodate public events, such as performances, fairs, reading, etc.; a playground; a shade structure; a fitness area; a walking loop; and benches and tables. Landscaped elements would be provided throughout the park and would include trees, shrubs and planter areas. Approximately 75 bicycle parking spaces would be provided along the northern boundary of the Project site and approximately 21 bicycle parking spaces along the southern boundary at 7th Street. The proposed Project also involves the conversion of the 12 existing parallel street parking spots adjacent to the library to approximately 17 angled parking spots on 7th Street and 11 angled parking spots on Serrano Avenue. Additionally, to provide adequate facilities for the anticipated users of the park and existing library, the restroom facilities within the library would be expanded and upgraded, which requires minor modifications internal to the existing restroom facilities.

Determination

Based on the analysis provided in this Initial Study/Mitigated Negative Declaration (IS/MND), BOE finds that, with incorporation of described revisions to the Project and mitigation measures, the proposed Project would not have a significant effect on the environment.

ORGANIZATION OF THE FINAL INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

This Final IS/MND has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] 21000 et. seq.) and the CEQA Guidelines (California Code of Regulations [CCR] 15000 et. seq.). This Final IS/MND is organized into the following sections:

Clarifications and Modifications: provides a detailed description of clarifications and modifications that were made to the text or graphics of the Draft Initial Study/Mitigated Negative Declaration (IS/MND). Clarifications and modifications reflect changes made to the proposed Project, analysis, or mitigation measures due to editorial or project design changes or as a result of a comment made by an agency or individual during the public review period. These clarifications and modifications do not constitute significant new information and do not change any of the conclusions of the document. This section also reflects changes necessary to combine the Draft IS/MND into this Final IS/MND.

Response to Comments on the Draft IS/MND: provides a list of agencies, organizations, and/or individuals commenting on the Draft IS/MND; copies of the written comments received during the Draft IS/MND public review period; and the lead agency responses to those comments.

Revised Draft IS/MND: The Draft IS/MND was circulated during the public review period, which ran from August 1, 2019 through August 21, 2019. This portion of the document includes the Draft IS/MND in its entirety, updated with the clarifications and modification integrated in to the document. New language added to the Final IS/MND is identified with underlined text and revised language is shown in ~~strikethrough~~ text.

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CLARIFICATIONS AND MODIFICATIONS

The following clarifications and modifications are intended to update the Draft IS/MND in response to comments received during the public review period. Additionally, any editorial and/or design changes that have been made since the Draft IS/MND was circulated for public review are documented in this section. These changes constitute the Final IS/MND, to be presented to the City of Los Angeles Board of Library Commissioners for adoption. None of the changes to the IS/MND would require recirculation of the document. Revisions made to the IS/MND have not resulted in new significant impacts or mitigation measures, nor has the severity of an impact increased. None of the CEQA criteria for recirculation have been met, and recirculation of the IS/MND is not warranted.

The changes to the IS/MND are listed by section, page number, and paragraph number if applicable. Text which has been removed is shown with a ~~strikethrough~~ line, while text that has been added is shown as underlined. All changes described in this section have also been made in the corresponding Final IS/MND sections.

Final IS/MND Clarification/Revision

Page

MND-4 *An editorial change has been made to the first paragraph on this page to clarify the surrounding uses. The second sentence in this paragraph is clarified as follows:*

The area immediately surrounding the Project site is completely urbanized and developed with commercial buildings and community open space to the north, various commercial buildings to the east and west, and ~~multi-family~~ residential dwellings to the south.

An editorial change has been made to the first paragraph in Section D, Description of the proposed Project, on this page to include a project component that was not included in the Draft IS/MND and clarify other project components. The project description is updated as follows:

The proposed Project involves the construction and operation of a new pocket park and underground parking structure on the site of the existing surface parking lot serving the Pio Pico Koreatown Library. The proposed Project would be designed to complement the library and would incorporate the western façade of the existing library into the park space with the addition of some external façade finishings, window/window seat and a shade trellis. The Project footprint is approximately 0.6 acre in size. Additionally, minor repairs to the other facades of the existing library would be performed, including cleaning, window updates, surface repairs, and re-touching, where needed. Implementation of the proposed Project would result in the removal of two carob

and two ficus trees, both ornamental species, which would subsequently be replaced according to City policies. The proposed parking structure would accommodate approximately 50 parking spaces in one subterranean level. The parking structure would include a Los Angeles Recreation and Parks (LARAP) shop area to conduct small repairs to park facilities and store tools. A parking attendant office would also be included. An elevator and stairwell would be located at the northeast corner of the parking structure. It is anticipated that the parking structure would be operational during the same hours that the Pio Pico Koreatown Public Library is open to the public. Vehicular access to the underground parking structure would be provided via the existing driveway location on Oxford Avenue. A security kiosk would be provided adjacent to the driveway, and a parking attendant would be on duty during operational hours. During non-operational hours, the overhead gate for the parking structure would be down and the parking structure would be inaccessible.

MND-7 *An editorial change has been made to clarify LARAP's and the Library Department's role in operation of the proposed Project. The last paragraph is modified as follows:*

~~Operation and maintenance of the park would be the responsibility of the City of Los Angeles Department of Recreation and Parks (LARAP).~~ The park would be open daily following the same schedule as the library. It is anticipated that the park would be maintained by existing LARAP staff under a Memorandum of Agreement (MOA) also known as a Memorandum of Understanding (MOU) between the Library Department and LARAP as approved by the Board of Recreation and Park Commissioners and the Board of Library Commissioners.

MND-9 *An editorial change has been made to Figure 3b, Conceptual Site Plan – Underground Parking Structure, to show the LARAP shop and the parking attendant office. The figure is updated as follows:*

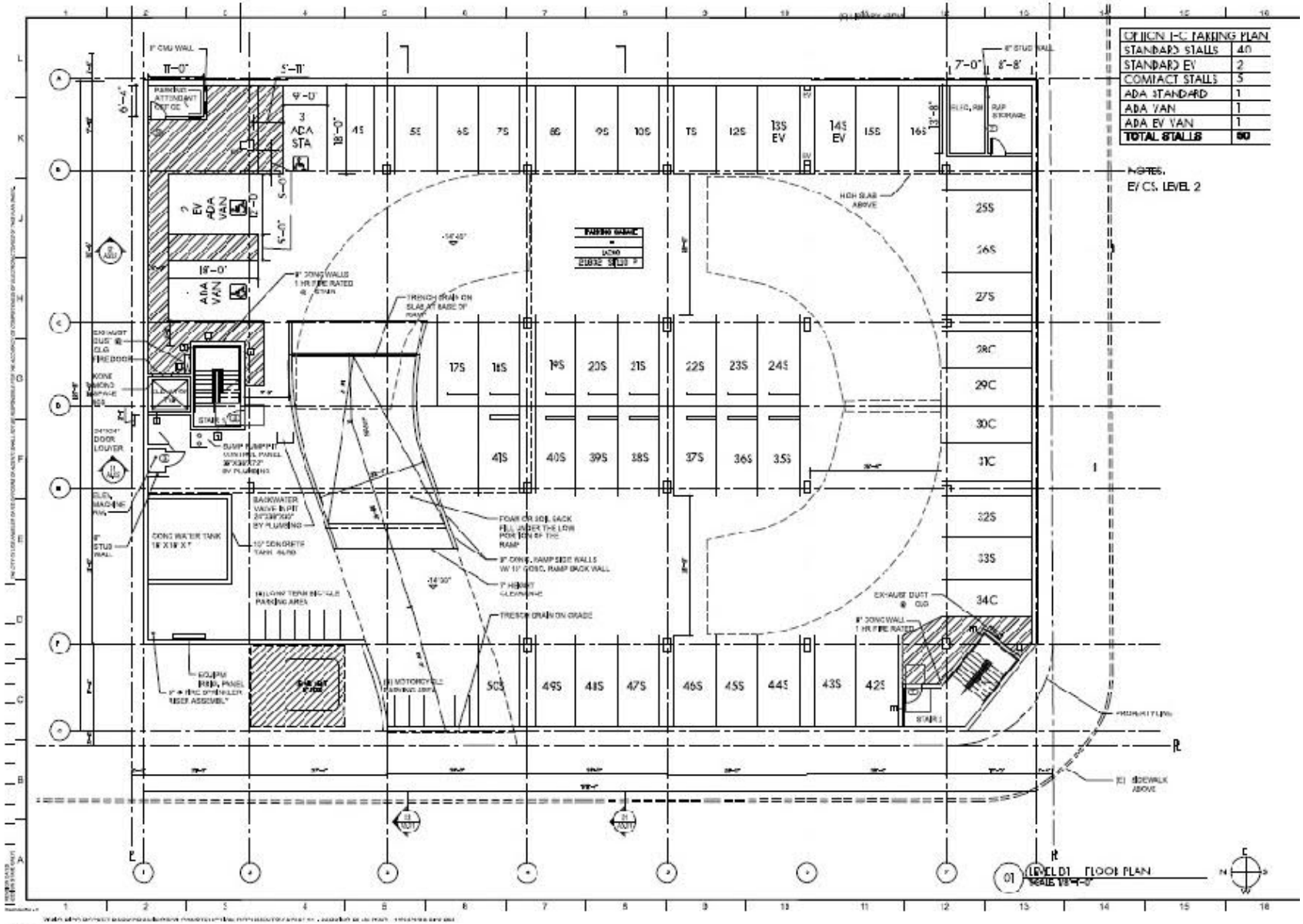

Figure 3b

Conceptual Site Plan - Underground Parking Structure

MND-13 *An editorial change has been made to Section F, Required Permits and Approvals, on this page to clarify the permits and approvals required to implement the proposed Project. The list of required permits and approvals is updated as follows:*

City of Los Angeles

- Department of Building and Safety: Building and Grading permits; and Zoning and Construction clearances;
- Department of Recreation and Parks: Memorandum of Agreement for proposed Project approved by the Department of Recreation and Parks Board of Commissioners; Adoption of Mitigated Negative Declaration (MND); CEQA Findings; Approval of final plans;
- Library Department: Memorandum of Agreement for proposed Project approved by Board of Library Commissioners; Adoption of Mitigated Negative Declaration (MND); Approval of final plans;
- Fire Department: Any applicable permits related to the parking structure and emergency access;
- Department of Public Works: ~~Recommendations regarding proposed Project approval and Mitigated Negative Declaration (MND) certification by Board of Public Works;~~ Issuance of "B" permits; Bid and Award of Construction Contract
- City Council Committee and City Council: ~~proposed~~ Project approvals as necessary and adoption of MND as necessary ~~certification~~.

MND-14 *An editorial change has been made to the first paragraph on this page to clarify the surrounding uses. The last sentence in this paragraph is clarified as follows:*

The area immediately surrounding the Project site is completely urbanized and developed with commercial buildings and community open space to the north, various commercial buildings to the east and west, and ~~multi-family~~ residential dwellings to the south.

MND-17 *An editorial change has been made to update the contact person for the environmental document. The contact person is updated as follows:*

Please contact Talmage Jordan at (213) 485-5754 or at Talmage.Jordan@lacity.org ~~Heloise Froelich at (213) 485-5111 or at Heloise.Froelich@lacity.org~~ or Maria Martin at (213) 485-5753 at Maria.Martin@lacity.org for information regarding the environmental document.

MND-37 *An editorial change has been made to the last paragraph on this page to clarify the policies related to the use of drought-tolerant species. The paragraph is modified as follows:*

The long-term climate change policy and regulatory changes that will be enacted to meet 2030 and 2050 emissions reduction targets are unknown at this time. As a consequence, the extent to which the proposed Project emissions and resulting impacts would be mitigated through implementation of statewide (and nationwide) changes is not known. However, some of the anticipated statewide actions (e.g., decarbonization, energy efficiency, alternative transportation) can be facilitated, at least to some extent, through implementation of specific GHG reduction measures in large-scale developments. The proposed Project includes policies related to planting drought-tolerant species resulting in reduced water consumption. <u>These policies follow California Assembly Bill 1881 Water Efficient Landscape Ordinance as well as the City of Los Angeles' Landscape Ordinance.</u> The Project is consistent with anticipated long-term statewide strategies to reduce GHG emissions. Accordingly, the Project would not conflict with the goals in EO S-3-05 and EO B-30-15. Therefore, the proposed Project would not conflict with any plans, policies, or regulations to reduce GHGs, and impacts would be less than significant.

MND-45 *An editorial change has been made to the first sentence in the first paragraph under the construction equipment discussion in Section 13(a) to correct a typo in the construction schedule. The sentence is modified as follows:*

Construction activity is anticipated to begin in May <u>2020</u> ~~2019~~ and take approximately 18 months to complete.

MND-57 *An editorial change has been made to the discussion of alternative modes of transportation in Section 17(a) to include a reference to the nearest subway stop. The paragraph is modified as follows:*

The roadway network in the vicinity of the proposed Project site is served by Metro, Santa Monica Big Blue Bus, and LADOT's DASH Shuttle System. <u>The nearest subway stop is the Metro Redline Wilshire/Western Station, approximately 0.13-mile northwest of the Project site.</u> Bicycle facilities in the Project area include 7th Street, which is a designated Bicycle Lane.

MND-58 *An editorial change has been made to the discussion in Section 17(b) clarify the VMT screening criteria used by LADOT. The first paragraph on this page is modified as follows:*

CEQA Guidelines section 15064.3 establishes vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts. VMT refers to the amount and distance of automobile travel attributable to a project. Section 4 of

15064.3, subdivision (b) defers to the lead agency for discretion to choose the most appropriate methodology to evaluate a project's VMT, including whether to express the change in absolute terms, per capita, per household or in any other measures. ~~Since BOE has not finalized its approach to VMT analysis, a qualitative analysis is provided below.~~ The Los Angeles Department of Transportation (LADOT) release its updated Transportation Assessment Guidelines for VMT in July of 2019. The screening criteria in these new guidelines designates 250 or more daily vehicle trips generated as the threshold for requiring additional analysis. Based on an anticipated total of 225 generated weekday trips, the proposed Project does not require further VMT analysis.

MND-60 *An editorial change has been made to expand the discussion of Native American consultation that has been conducted for the proposed Project in Section 18(b). The first paragraph on this page is modified as follows:*

Though no previously identified archaeological resources associated with Native American culture have been identified within a 0.5-mile radius of the Project area, and no documented tribal cultural resources were identified in the archival research and outreach performed thus far, the Native American representatives contacted for the Project indicated that the area is potentially sensitive for tribal cultural resources due to the presence of nearby local historical waterways that are no longer present. Mitigation measures CUL-1 and CUL-2 could be implemented during construction and would include further consultation with Native American parties. As presented in Appendix C, prior to circulation of the Draft IS/MND, the City submitted a request to the Native American Heritage commission (NAHC) for a CEQA Tribal Consultation List pursuant to AB52 for the proposed Project. In January of 2018, the City sent a formal notice to the California Native American Tribes identified by NAHC, as well as others with a potential interest in the Project, informing them of the City's decision to undertake the proposed Project and requesting a response from the Tribes within 30 days if they wished to consult on the Project (see Appendix C). Four tribes responded with interest in the Project and consultation occurred in January and February of 2018. They City closed consultation with the four tribes in September of 2019 informing the tribes of the determination made in this section pertaining to tribal cultural resources. This correspondence and other pertinent information to the AB52 consultation process are maintained in a confidential appendix to this IS/MND (Appendix I) pursuant to AB52 requirements and PRC 21082.3. With the implementation of mitigation measure CUL-1 and CUL-2, and ongoing consultation with Native American representatives, impacts to archaeological resources, including tribal cultural resources, would be less than significant.

MND-67 *An editorial change has been made to Section V, Name of Preparers, on this page. The list of preparers under the Lead Agency is updated as follows:*

LEAD AGENCY

City of Los Angeles Department of Public Works
Bureau of Engineering
Environmental Management Group
1149 South Broadway, Suite 600
Los Angeles, CA 90015

- Maria E. Martin, Environmental Affairs Officer
- Dr. Jan Green Rebstock, Environmental Supervisor II
- Heloise Froelich, Environmental Supervisor I
- Talmage Maxwell Jordan, Environmental Scientist II

Bureau of Engineering
Architectural Division

- Herbert Guevara, Architectural Associate
- Ioana June, Civil Engineer

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RESPONSE TO COMMENTS ON THE DRAFT IS/MND

A. Introduction

The Pio Pico Library Pocket Park & Underground Parking Structure Project Draft IS/MND was circulated for public review and comment by the City of Los Angeles on August 1, 2019, initiating a 20-day public review period pursuant to CEQA and its implementing guidelines. The Notice of Intent/Notice of Availability was published in the August 1, 2019 edition of the Los Angeles Times newspaper, and was also distributed to 31 relevant agencies and organizations, as well as approximately 1,400 owners and occupants of properties within a 500-foot radius of the Project site. Additionally, the IS/MND was available for review at the Pio Pico – Koreatown Branch Library, Los Angeles Central Library, Council District 10 Office, and the BOE headquarters. The IS/MND was also available online at the BOE website.

During this public review period, four (4) comment letters were received, as shown in Table RTC-1 below. Each comment letter has been assigned a number code, and individual comments in each letter have been coded to facilitate responses. For example, the letter from the California Department of Transportation is identified as Letter 1, with comments noted as 1-1, 1-2, 1-3, etc. Copies of each comment letter are provided prior to the response to each letter. Comments that raise issues not directly related to the substance of the environmental analysis in the IS/MND are noted but, in accordance with CEQA, did not receive a detailed response.

B. Responses to Written Comments That Address Environmental Issues in the Draft Initial Study/Mitigated Negative Declaration

The written comment letters received on the Draft IS/MND are listed in Table RTC-1 below. The comments and associated responses are arranged by the date of receipt of the comment letter or email. The individual comments in the letters have been numbered and are referred to in the responses that directly follow the comment letter.

Table RTC-1
List of Written Comment Letters Received in Response to the Draft IS/MND

Letter #	Agency/Organization/Individual	Date	Page # of Response
1	California Department of Transportation *Signed: Miya Edmonson*	August 14, 2019	RTC-3
2	Kim, Kitae	August 19, 2019	RTC-5
3	rjwsong@gmail.com	August 19, 2019	RTC-7
4	Lee, J.	August 21, 2019	RTC-9

Comment Letter No. 1

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-6536
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

August 14, 2019

Talmage Maxwell Jordan
City of Los Angeles, Department of Public Works
Bureau of Engineering
1149 S. Broadway, Suite 600, Mail Stop 939
Los Angeles, CA 90015

RE: Pio Pico Library Pocket Park & Underground Parking Structure Project – Mitigated Negative Declaration (MND)
GTS # 07-LA-2019-02722
Vic. LA-10/ PM: R12.891

Dear Mr. Jordan:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for this Mitigated Negative Declaration (MND). The proposed project involves the construction and operation of a new pocket park and underground parking structure on the site of the existing surface parking lot serving the Pio Pico Koreatown Library. The proposed project would incorporate the western façade of the existing library into the park, providing some external facade finishings, window/window seat, and a shade trellis. 1-1

After reviewing the MND, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities. 1-2

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods. 1-3

Additionally, new developments should keep livability in mind by providing shade trees, native drought-tolerant landscaping, bioswales, street furniture, and bicycle parking. Traffic calming measures such as curb extensions, bulb-outs, or speed tables can increase safety. Installing high-visibility continental crosswalks that are ADA compliant can decrease conflict between pedestrians and motorists. Accessibility can be improved by ensuring easy access to transit and by installing bicycle routes along the project site. 1-4

If you have any questions, please contact project coordinator David Calkins, at david.calkins@dot.ca.gov, and refer to GTS # 07-LA-2019-02722.

Sincerely,

MIYA EDMONSON
IGR/CEQA Branch Chief

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Comment Letter 1: California Department of Transportation

Response 1-1
This comment correctly characterizes the proposed Project in the IS/MND. Therefore, no further response to this comment is provided.

Response 1-2
The commenter states that they do not expect Project approval to result in a direct adverse impact to the existing State transportation facilities. This comment does not raise issues regarding the adequacy of the analysis in the IS/MND. No further response to this comment is required.

Response 1-3
The commenter states that transportation of heavy construction equipment and/or other materials requiring the use of oversized vehicles on State highways would require a transportation permit. The proposed Project would be required to comply with all applicable California Department of Transportation regulations during construction. Additionally, to the extent practicable, large size truck trips would be limited to off-peak commute periods.

Response 1-4
The commenter provides suggestions regarding livability in new developments. As discussed in Section D, Description of the Proposed Project, on page 4 of the IS/MND, the proposed Project would include landscaping in the form of trees, shrubs, and planter areas, and would include shade trellises. Additionally, as discussed on page 7 of the IS/MND, the proposed Project would provide approximately 75 bicycle parking spaces along the northern boundary of the Project site and approximately 21 bicycle parking spaces along the southern boundary of the property along 7th Street. Furthermore, as discussed in analysis sections 8, Greenhouse Gas Emissions, and 17, Transportation, of the Environmental Screening Checklist in the IS/MND, the Project site is served by several alternative modes of transportation. The Project site is located within walking distance of the Los Angeles County Metropolitan Transportation Authority (Metro) Purple Line Wilshire/Western Station; Metro local bus lines 20 and 720 along Wilshire Boulevard, Metro local bus line 207 and Los Angeles Department of Transportation (LADOT) DASH lines along Western Avenue. The roadway network in the vicinity of the Project site is served by Metro, Santa Monica Big Blue Bus, and LADOT's DASH Shuttle System. Bicycle facilities in the Project area include 7th Street, which is a designated Bicycle Lane. Pedestrian facilities serving the Project area include sidewalks around the perimeter of the Project site along Serrano Avenue, 7th Street, and Oxford Avenue. As such, the proposed Project has been designed with livability in mind and incorporates several of the elements suggested by the commenter.

Comment Letter No. 2

Talmage Jordan <talmage.jordan@lacity.org>

Pio Pico Library Pocket Park & Underground Parking Structure Comments

Kim Kitae <kitaekim@hotmail.com> Mon, Aug 19, 2019 at 4:30 PM
To: "talmage.jordan@lacity.org" <talmage.jordan@lacity.org>

Hello, whom it may concern,

I strongly **disagree** with this project. 2-1

Thx.

Sent from my iPad

Comment Letter 2: Kim, Kitae

Response 2-1
The commenter expresses their opposition to the proposed Project. This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. No further response to this comment is required. Notwithstanding, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment Letter No. 3

Talmage Jordan <talmage.jordan@lacity.org>

Pio pico library pocket park & underground parking structure comments

rjwsong@gmail.com <rjwsong@gmail.com> Mon, Aug 19, 2019 at 4:33 PM
To: talmage.jordan@lacity.org

Hello.
Disagree this project !!!!!! | 3-1

Sent from my iPhone

Comment Letter 3: rjwsong@gmail.com

Response 3-1
The commenter expresses their opposition to the proposed Project. This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. No further response to this comment is required. Notwithstanding, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment Letter No. 4

Talmage Jordan <talmage.jordan@lacity.org>

Pio Pico Library Pocket Park & Underground Parking Structure Comments

J Lee <0323sophia@gmail.com> Wed, Aug 21, 2019 at 1:50 PM
To: talmage.jordan@lacity.org

Dear Talmage Jordan
I totally disagree about the project of pio pico library pocket park. 4-1
The surrounding of the library already has some homeless issues including inside the library.
In addition that even LA city and county didn't have solution about more criminal issues. 4-2
More Green places and parks are important.
However "safety" is more important for community members and library patrons.
and Some people heard and read the suspicious article; pocket park at thre library instead of green zone Whilshire and Oxford ave. 4-3
I don't want to waste citizen's tax and duty of police officers to add the profits of business owners who own the green zone at the corner Whilshire Bl.and Oxford ave.

Comment Letter 4: Lee, J.

Response 4-1
The commenter expresses their opposition to the proposed Project. This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. No further response to this comment is required. Notwithstanding, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Response 4-2
The commenter expresses their concern regarding safety at the Project site and the surrounding area. As discussed in Section D, Description of the Proposed Project, beginning on page 4 of the IS/MND, a security kiosk would be provided adjacent to the driveway, and a parking attendant would be on duty during operational hours. During non-operational hours, the overhead gate for the parking structure would be down and the parking structure would be inaccessible. Additionally, the design of the park would incorporate lighting and other security measures. Area lighting would be evenly spread throughout the park via vertical post LED fixtures. Trees and landscaped areas would have LED up-lighting at their bases. Shade structures and screen elements would have integrated LED lighting that glow at night. Steps and ramps would contain integrated step lights, and pathways would have low path lighting at regular intervals. Temporary lighting would be provided during special events. Additionally, landscaping and fencing would provide physical barriers between the playground area and the rest of the park. Thus, the proposed Project has been designed with public safety and security in mind.

Response 4-3
The commenter expresses concern that the Project would require police protection services. The commenter is referred to analysis section 15 (ii), Public Services – Police Protection, of the Environmental Screening Checklist on page 53 of the IS/MND, which states “the proposed Project would serve the existing community and would not generate population growth. Therefore, construction and operation of the proposed Project would not require the construction or expansion of police facilities. The local police station would be notified, as appropriate, of the construction schedule so as to coordinate emergency response routing during construction work.” The IS/MND concludes that the impact to police protection services would be less than significant.

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CITY OF LOS ANGELES
CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY

(Article I - City CEQA Guidelines)

Council District: 10 Date: August 2019

Lead City Agency: Department of Public Works, Bureau of Engineering

Project Title: PIO PICO LIBRARY POCKET PARK & UNDERGROUND PARKING STRUCTURE PROJECT
Work Order No. E1908188

I. INTRODUCTION

A. Purpose of an Initial Study

The *California Environmental Quality Act* (CEQA) was enacted in 1970 for the purpose of providing decision-makers and the public with information regarding environmental effects of proposed projects; identifying means of avoiding environmental damage; and disclosing to the public the reasons behind a project's approval even if it leads to environmental damage. The Bureau of Engineering (BOE), Environmental Management Group (EMG) has determined that the proposed Project is subject to CEQA and no exemptions apply. Therefore, the preparation of an Initial Study is required.

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

This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), the City of Los Angeles CEQA Guidelines (1981, amended July 31, 2002), and the L.A. CEQA Thresholds Guide (2006).

B. Document Format

This IS/MND is organized into six sections as follow:

Section I, Introduction: provides an overview of the Project, presents the format of the document, and provides an overview of the CEQA environmental documentation process.

Section II, Project Description: provides a description of the Project background, Project location, and Project components.

Section III, Existing Environment: provides a description of the existing environmental setting with focus on features of the environment that could potentially affect the proposed Project or be affected by the proposed Project.

Section IV, Environmental Screening Checklist: provides a detailed discussion of the environmental factors that would be potentially affected by this Project as indicated by the screening checklist in this section. Mitigation measures are identified where necessary to reduce any potential adverse impacts of the proposed Project to a less than significant level. This section also provides a determination for the recommended environmental documentation for the proposed Project

Section V, Name of Preparers: provides a list of key personnel involved in the preparation of this report and key personnel consulted.

Section VI, References: provides a list of reference materials used during the preparation of this report.

C. CEQA Process

CEQA applies to proposed projects initiated by, funded by, or requiring discretionary approvals from state or local government agencies. The proposed Project constitutes a project as defined by CEQA (California Public Resources Code Section 21000 et seq.). CEQA Guidelines Section 15367 states that a "Lead Agency" is "the public agency which has the principal responsibility for carrying out or approving a project." Therefore, BOE is the lead agency responsible for compliance with CEQA for the proposed Project.

The proposal to adopt a ND (or MND) initiates a 20-day public comment period, 30 days if a State Agency is involved. The purpose of this comment period is to provide public agencies and the general public an opportunity to review the IS and comment on the adequacy of the analysis and the findings of the lead agency regarding potential environmental impacts of the proposed Project. If a reviewer believes there is substantial evidence that the Project may have a significant effect on the environment, the reviewer should (1) identify the specific effect, (2) explain why it is believed the effect would occur, and (3) explain why it is believed the effect would be significant. Facts or expert opinion supported by facts should be provided as the basis of such comments.

Prior to making a determination, the decision-making body (for this proposed Project, it is the Board of Public Works and City Council) must consider the IS together with any comments received during the public comment review process. The decision-making body would adopt the IS only if it finds, on the basis of the whole record before it, that there is no substantial evidence that the project would have a significant effect on the environment and that the study reflects the lead agency's independent judgment and analysis.

If the Project is approved, the City would file a Notice of Determination (NOD) with the County Clerk within 5 days of approval. The NOD would be posted by the County Clerk within 24 hours of receipt. This begins a 30-day statute of limitations on legal challenges to the approval under CEQA. The ability to challenge the approval in court may be limited to those persons who objected to the approval of the Project, and to issues which were presented to the lead agency either orally or in writing, during the public comment period.

As a covered entity under Title II of the *Americans with Disabilities Act*, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services, and activities.

II. PROJECT DESCRIPTION

A. Project Background

The proposed Project is located in Los Angeles City Council District 10 (CD 10), in one of the densest communities in the United States. The Koreatown area contains approximately 40,000 residents. Based on the Countywide Comprehensive Parks and Recreation Needs Assessment, the Wilshire-Koreatown study area has a very high need for parks.[1] There is approximately 0.1 park acres per 1,000 people in this study area. The parks within the Wilshire-Koreatown study area comprise 18.2 acres, including Lafayette Park, Madison West Park, Seoul International Park, Shatto Recreation Center, and Wilton Place Park. Less than 40 percent of the population within the study area lives within 0.5-mile of a park. After completion, the proposed Project would be the only urban public park in the Koreatown area, and would serve residents, as well as the thousands of visitors and those who work in the area.

B. Location

The Project site is located at 694 South Oxford Avenue in the Koreatown neighborhood in the central portion of the City of Los Angeles (City). The Project site is generally bound by an office building to the north, South Serrano Avenue on the east, 7th Street on the south,

[1] Los Angeles County Department of Parks and Recreation, *Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment, Appendix A: Study Area Profiles, City of LA – Wilshire/Koreatown*, available at: https://lacountyparkneeds.org/FinalReportAppendixA/StudyArea_068.pdf, accessed May 25, 2018.

and South Oxford Avenue on the west. Major arterials providing access to the Project site are Wilshire Boulevard, one block to the north, and West Olympic Boulevard, approximately four blocks to the south. The area immediately surrounding the Project site is completely urbanized and developed with commercial buildings and community open space to the north, various commercial buildings to the east and west, and ~~multi-family~~ residential dwellings to the south. Figure 1 shows the regional vicinity of the Project site and Figure 2 shows the proposed Project location.

C. Purpose

The overall purpose of the proposed Project is to provide a public open green park space for the Koreatown neighborhood, which is currently lacking in parkland.

D. Description of Proposed Project

The proposed Project involves the construction and operation of a new pocket park and underground parking structure on the site of the existing surface parking lot serving the Pio Pico Koreatown Library. The proposed Project would be designed to complement the library and would incorporate the western façade of the existing library into the park space with the addition of some external façade finishings, window/window seat and a shade trellis. The Project footprint is approximately 0.6 acre in size. Additionally, minor repairs to the other facades of the existing library would be performed, including cleaning, window updates, surface repairs, and re-touching, where needed. Implementation of the proposed Project would result in the removal of two carob and two ficus trees, both ornamental species, which would subsequently be replaced according to City policies. The proposed parking structure would accommodate approximately 50 parking spaces in one subterranean level. The parking structure would include a Los Angeles Recreation and Parks (LARAP) shop area to conduct small repairs to park facilities and store tools. A parking attendant office would also be included. An elevator and stairwell would be located at the northeast corner of the parking structure. It is anticipated that the parking structure would be operational during the same hours that the Pio Pico Koreatown Public Library is open to the public. Vehicular access to the underground parking structure would be provided via the existing driveway location on Oxford Avenue. A security kiosk would be provided adjacent to the driveway, and a parking attendant would be on duty during operational hours. During non-operational hours, the overhead gate for the parking structure would be down and the parking structure would be inaccessible.

The proposed pocket park would be located at the ground level in the footprint of the existing surface parking lot. Proposed park elements include a multi-purpose event area, located at the library's western façade adjacent to the building entrance, to accommodate public events, such as performances, fairs, readings, etc.; a playground for small children; a shade structure; a fitness area; a walking loop; and benches and tables. Landscaped elements would be provided throughout the park and would include trees, shrubs, and planter areas. Pedestrian access to the park would be provided at the northeast corner of 7th Street and Oxford Avenue, as well as on the eastern side of the park where it would interface with the library entrance.

Source: Esri Maps & Data, 2018

Figure 1
Regional Vicinity Map

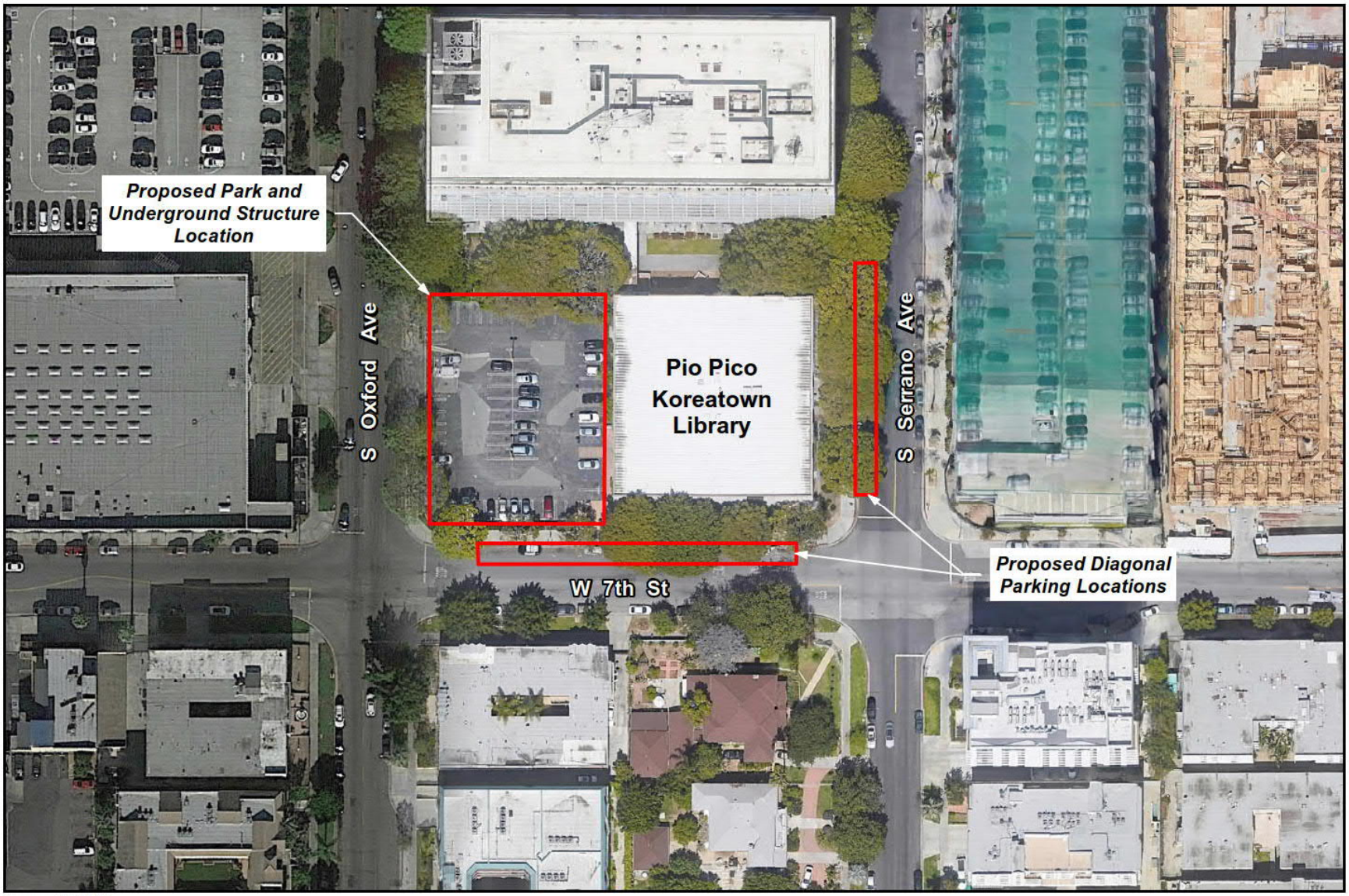


Figure 2

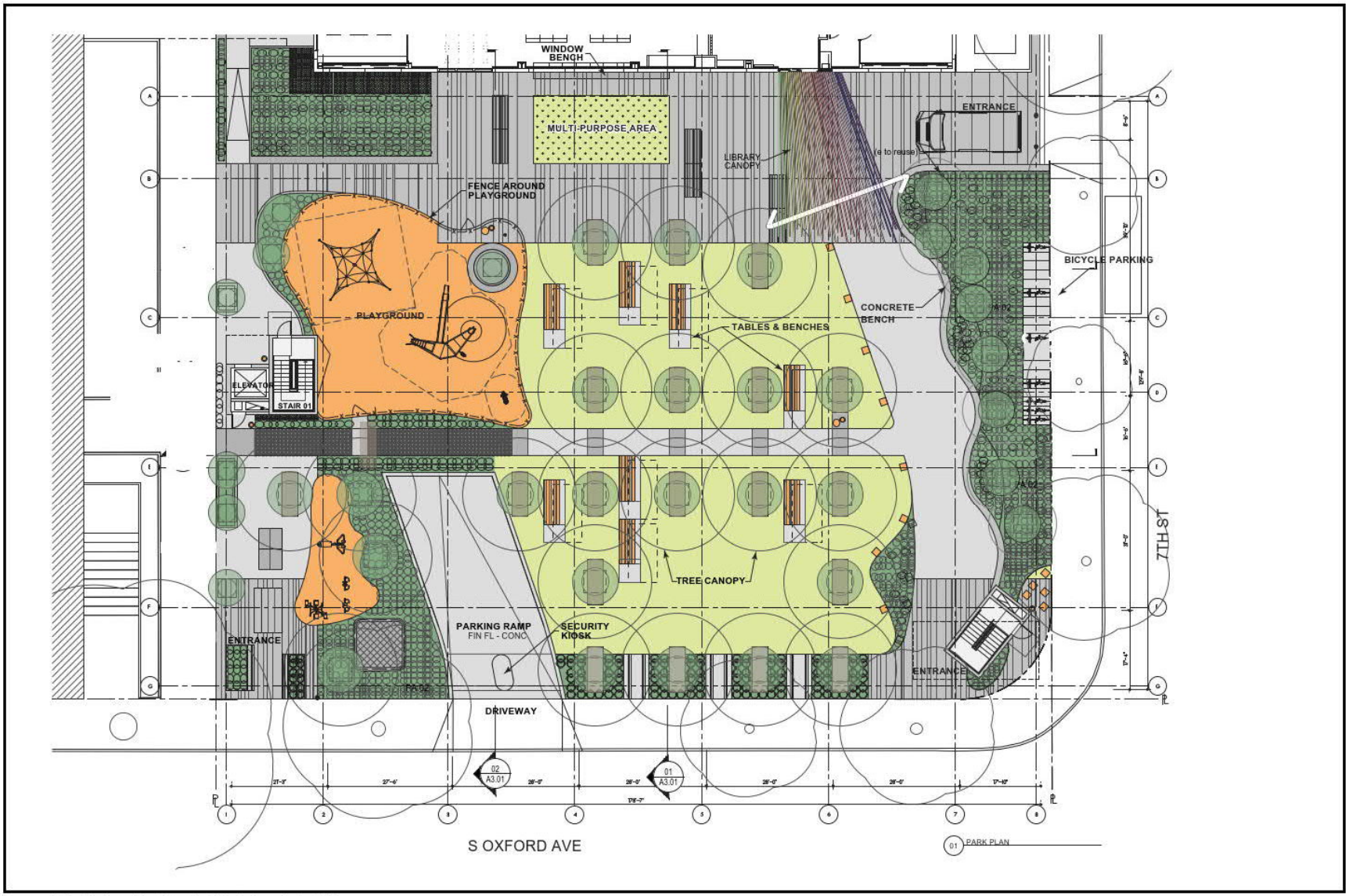
Project Location Map

The proposed Project would provide bicycle parking with approximately 75 bicycle parking spaces along the northern boundary of the Project site and approximately 21 bicycle parking spaces along the southern boundary of the property along 7th Street. The proposed Project also involves the conversion of the 12 existing parallel street parking spots adjacent to the library property to angled parking spots, which would accommodate approximately 17 parking spaces along 7th Street and 11 parking spaces along Serrano Avenue. Figures 3a and 3b show the conceptual site plans, while Figure 4 shows a cross section of the proposed Project.

The design of the park would incorporate lighting and other security measures. Area lighting would be evenly spread throughout the park via vertical post LED fixtures. Trees and landscaped areas would have LED up-lighting at their bases. Shade structures and screen elements would have integrated LED lighting that glow at night. Steps and ramps would contain integrated step lights, and pathways would have low path lighting at regular intervals. Temporary lighting would be provided during special events. Additionally, landscaping and fencing would provide physical barriers between the playground area and the rest of the park.

To provide adequate facilities for the anticipated users of the park and existing library, the restroom facilities within the library would be expanded and upgraded. While this upgrade would support the proposed Project, this component of the Project requires minor modifications internal to the existing restroom facilities.

~~Operation and maintenance of the park would be the responsibility of the City of Los Angeles Department of Recreation and Parks (LARAP).~~ The park would be open daily following the same schedule as the library. It is anticipated that the park would be maintained by existing LARAP staff under a Memorandum of Agreement (MOA) also known as a Memorandum of Understanding (MOU) between the Library Department and LARAP as approved by the Board of Recreation and Park Commissioners and the Board of Library Commissioners.

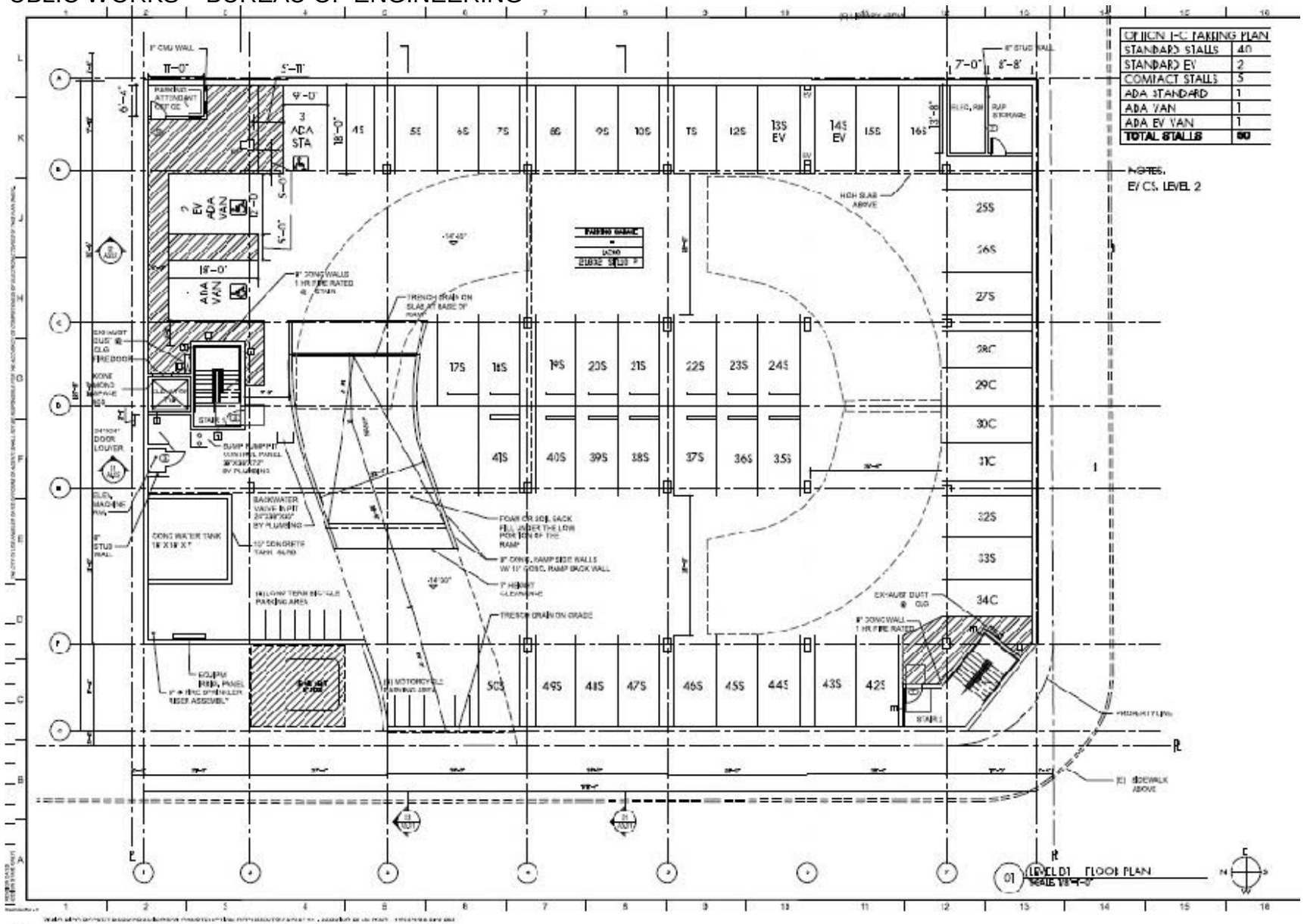


Source: Johnfriedman Alicekimm Architects, Inc., July, 2019.

NOT TO SCALE

Figure 3a

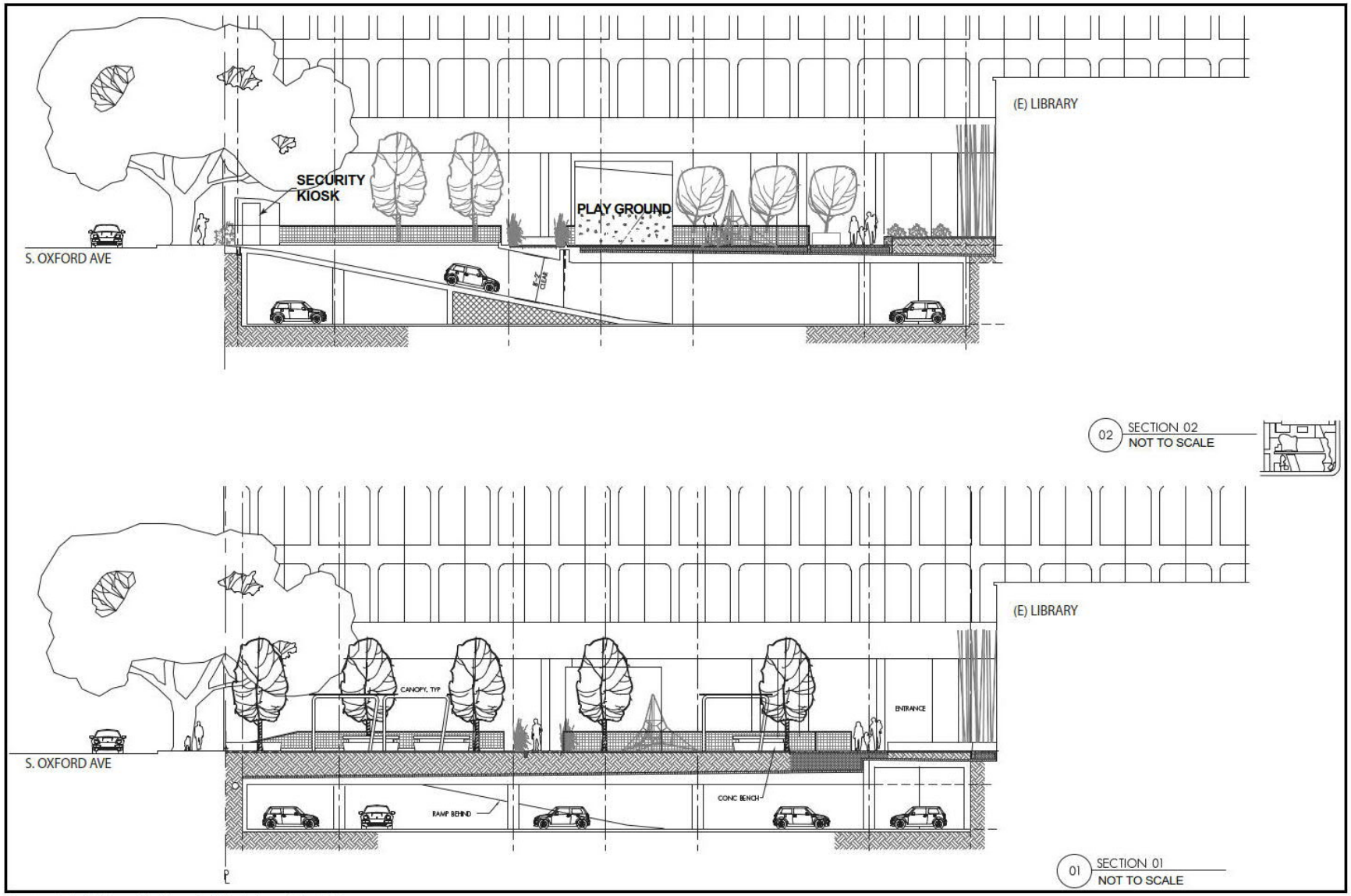
Conceptual Site Plan - Pocket Park



NOT TO SCALE

Figure 3b

Conceptual Site Plan - Underground Parking Structure



Source: Johnfriedman Alicekimm Architects, Inc., July, 2019.

Figure 4

Proposed Project Cross Sections

E. Construction Schedule and Procedures

Construction of the proposed Project is anticipated to begin in May 2020 and take approximately 18 months to complete, concluding in November 2021. The Pio Pico Koreatown Branch Library would remain open during construction activities. Construction activity would occur Monday through Friday from 7:00 a.m. to 4:00 p.m.

The 18-month construction period would include demolition, excavation, and grading activities; installation of building foundations and utilities; and installation of park elements, landscaping, and hardscape elements. The Project site would be excavated to a depth of approximately 14 feet, with excavation of approximately 11 feet to the top of the parking slab and an additional 3 feet to the bottom of the footing. Approximately 10,000 cubic yards of material would be excavated as part of the proposed Project and would be hauled away from the Project site. Approximately 1,000 cubic yards of material would be imported to the Project site for backfill. It is anticipated that four existing trees, including two carob trees and two ficus trees, would be removed and replaced as part of the proposed Project.

Construction equipment expected to be used includes cranes, trucks, bulldozers, excavators, wheel loaders, grader, compactors, light trucks, concrete vibrators, vacuums, mixers, pumps, saws, wheelbarrows, and levels. Construction equipment and materials staging would occur on the Project site. During construction, the Project site would be accessed from the existing driveway located on Oxford Avenue. It is anticipated that haul trucks would travel to the Project site using Interstate 10 (I-10), then travel north on Western Avenue to 7th Street, then east on 7th Street to Oxford Avenue. Partial street closures along Serrano Avenue and 7th Street would be required for approximately 8 to 14 months. The conversion of the on-street parallel parking spaces along Serrano Avenue and 7th Street to angled spaces would also require closure of the sidewalks in those areas during construction. Access to the library would be maintained via the entrance along Serrano Avenue and along the north side of the library, as appropriate. The entrance on the north side of the library is compliant with the Americans with Disabilities Act.

An appropriate combination of monitoring and resource avoidance would be employed during all construction activities, including implementation of the following Best Management Practices (BMPs):

- Construction of the proposed Project is anticipated to occur Monday through Friday from 7:00 a.m. to 4:00 p.m. Should construction be required outside of the anticipated hours, construction activity would comply with the allowable hours of construction as dictated in the *Los Angeles Municipal Code Section 41.40*, including 7:00 a.m. to 9:00 p.m. Monday through Friday, 8:00 a.m. to 6:00 p.m. on Saturday, and no construction activity on Sundays or federal holidays.

- The proposed Project would implement Rule 403 fugitive dust control measures required by the South Coast Air Quality Management District (SCAQMD), which requires reasonable precautions to be taken to prevent visible particulate matter from being airborne, under normal wind conditions, beyond the property from which the emission originates. Reasonable precautions include, but are not limited to, the following:
    - Application of water on dirt roads, material stockpiles, and other surfaces that can give rise to airborne dusts; and
    - Maintenance of roadways in a clean condition.
- The proposed Project would implement erosion control where necessary that may include, but would not be limited to, the following:
    - Minimizing the extent of disturbed areas and duration of exposure;
    - Stabilizing and protecting disturbed areas;
    - Keeping runoff velocities low;
    - Retaining sediment within the construction area;
    - Use of silt fences or straw wattles;
    - Temporary soil stabilization;
    - Temporary drainage inlet protection;
    - Temporary water diversion around the immediate work area; and
    - Minimizing debris from construction vehicles on roads providing construction access.
- The proposed Project would implement Rule 402 measures required by the SCAQMD, which prohibits the discharge from any source whatsoever, such quantities of air contaminants or other materials that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or that cause or have a natural tendency to cause injury or damage to business or property.
- BOE would ensure all construction crews have fire-suppression equipment (such as fire extinguishers) on site to respond to the accidental ignition of a fire.
- Spill kits will be available onsite for potential leaks or spills of hazardous materials.
- BOE or its contractor would minimize short-term construction noise through: (1) proper maintenance and tuning of all construction equipment engines to minimize noise emissions; and (2) proper maintenance and functioning of the mufflers on all internal combustion and equipment engines.

- The proposed Project construction would incorporate source reduction techniques and recycling measures and maintain a recycling program to divert waste in accordance with the Citywide Construction and Demolition Debris Recycling Ordinance.

- BOE would coordinate with all applicable agencies regarding construction schedules and worksite traffic control and detour plans, including but not limited to the City of Los Angeles Department of Transportation, the Los Angeles County Metropolitan Transportation Authority, City of Los Angeles Police Department (LAPD), and City of Los Angeles Fire Department (LAFD). In addition, temporary library patron parking will be supplied by the construction contractor, as needed.

F. Required Permits and Approvals

Numerous approvals and/or permits would be required to implement the proposed Project. The environmental documentation for the proposed Project would be used to facilitate compliance with federal and state laws and the granting of permits by various state and local agencies having jurisdiction over one or more aspects of the proposed Project. These approvals and permits may include, but may not be limited to, the following:

City of Los Angeles

- Department of Building and Safety: Building and Grading permits; and Zoning and Construction clearances;
- Department of Recreation and Parks: Memorandum of Agreement for proposed Project approved by the Department of Recreation and Parks Board of Commissioners; Adoption of Mitigated Negative Declaration (MND); Approval of final plans;
- Library Department: Memorandum of Agreement for proposed Project approved by Board of Library Commissioners; Adoption of Mitigated Negative Declaration (MND); Approval of final plans;
- Fire Department: Any applicable permits related to the parking structure and emergency access;
- Department of Public Works: ~~Recommendations regarding proposed Project approval and Mitigated Negative Declaration (MND) certification by Board of Public Works;~~ Issuance of "B" permits; Bid and Award of Construction Contract;
- City Council Committee and City Council: ~~proposed~~ Project approvals as necessary and adoption of MND as necessary ~~certification~~.

III. EXISTING ENVIRONMENT

The Project site is located in the Koreatown neighborhood in the central portion of the City of Los Angeles. The area immediately surrounding the Project site is completely urbanized and developed with commercial buildings and community open space to the north, various commercial buildings to the east and west, and ~~multi-family~~ residential dwellings to the south.

The Project site currently contains the 60-space surface parking lot of the Pio Pico Koreatown Branch of the Los Angeles Public Library and 12 parallel parking spaces along Serrano Avenue and 7th Street. The library is located at the northwest corner of Serrano Avenue and 7th Street with the parking lot located directly west of and adjacent to the library. Vehicular access to the existing surface parking lot is provided on Oxford Avenue. The parking lot is surrounded by a low brick wall and contains a guard station and boom gates at the entrance on Oxford Avenue. A sliding gate blocks access to the parking lot during the hours when the library is closed to the public. Ornamental trees and shrubs line the sidewalks abutting the property. The library is operated and managed by the City of Los Angeles Library Department, and is open to the public on Monday and Wednesday from 10:00 a.m. to 8:00 p.m.; Tuesday and Thursday from 12:00 p.m. to 8:00 p.m.; Friday and Saturday from 9:30 a.m. to 5:30 p.m.; and is closed on Sunday.

The Project site totals approximately 0.6 acre and is zoned CR (Limited Commercial) and P (Automobile Parking) and designated for Commercial uses in the City of Los Angeles General Plan.[2]

The California Department of Conservation, California Geological Survey's Seismic Hazard Zonation Program Map indicates that the Project site is not within an Alquist-Priolo Earthquake Fault Zone. The nearest fault zone to the Project site is the Puente Hills Fault, which is located approximately 0.5 mile southeast of the site and no active faults are known to cross the Project site.[3] The Project site is not located within a designated liquefaction zone.[4] The Project site is not located within a 100-year floodplain.[5]

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2 City of Los Angeles Department of City Planning, ZIMAS. Website: http://zimas.lacity.org/, accessed January 24, 2018.

3 California Department of Conservation Division of Mines and Geology. *Earthquake Fault Zones and Seismic Hazard Zones Map, Hollywood Quadrangle*. Website: http://gmw.consrv.ca.gov/SHMP/download/quad/HOLLYWOOD/maps/Hollywood_EZRIM/Hollywood_EZRIM.pdf, accessed January 24, 2018.

4 City of Los Angeles Department of City Planning, ZIMAS. Website: http://zimas.lacity.org/, accessed January 24, 2018.

5 Federal Emergency Management Agency. Flood Map Service Center, *Flood Insurance Rate Map, Panel 1615*. Website: https://msc.fema.gov/portal/search, accessed January 24, 2018.

IV. ENVIRONMENTAL SCREENING CHECKLIST

Potential Environmental Effects:

The environmental factors checked below would be potentially affected by this Project, involving at least one impact is identified as a "Potentially Significant Impact" as indicated in the Environmental Screening Checklist below. A detailed discussion of these potential environmental effects follows.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology /Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology / Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☐ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities / Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

Determination – Recommended Environmental Document:

A. Summary

This CEQA Initial Study has been prepared to assist the lead agency in determining whether the proposed Project would result in significant adverse environmental impacts. Based on the nature and scope of the proposed Project and the evaluation contained in the Environmental Screening Checklist (contained herein below), it has been determined that the proposed Project would not result in potentially significant impacts to any environmental issue areas.

B. Recommended Environmental Documentation

On the basis of this initial evaluation:

I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

Prepared By:

Shannon Ledet
Senior Project Manager
AECOM

Reviewed By:

Heloise Froelich
Environmental Supervisor I
Environmental Management Group

Approved By:

Maria Martin
Environmental Affairs Officer
Environmental Management Group

ENVIRONMENTAL SCREENING CHECKLIST

This section documents the screening process used to identify and focus upon environmental impacts that could result from the proposed Project. The IS Checklist below follows closely the form prepared by the Governor's Office of Planning and Research and was used in conjunction with the City's *L.A. CEQA Thresholds Guide* and other sources to screen and focus upon potential environmental impacts resulting from this project. Impacts are separated into the following categories:

- No Impact. This category applies when a project would not create an impact in the specific environmental issue area. A "No Impact" finding does not require an explanation when the finding is adequately supported by the cited information sources (e.g., exposure to a tsunami is clearly not a risk for projects not near the coast). A finding of "No Impact" is explained where the finding is based on project-specific factors as well as general standards (e.g., the Project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

- Less Than Significant Impact. This category is identified when the Project would result in impacts below the threshold of significance, and would therefore be a less than significant impact.

- Less Than Significant After Mitigation. This category applies where the incorporation of mitigation measures would reduce a "Potentially Significant Impact" to a "Less Than Significant Impact." The mitigation measures are described briefly along with a brief explanation of how they would reduce the effect to a less than significant level. Mitigation measures from earlier analyses may be incorporated by reference.

- Potentially Significant Impact. This category is applicable if there is substantial evidence that a significant adverse effect might occur, and no feasible mitigation measures could be identified to reduce impacts to a less than significant level. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report (EIR) is required. There are no such impacts for the proposed Project.

Sources of information that adequately support these findings are referenced at the end of the analysis for each question. They are also listed in Section IV, References, of this document. All sources so referenced are available for review at the offices of the Bureau of Engineering, 1149 South Broadway, Suite 600, Los Angeles, California 90015.

Please contact Talmage Jordan at (213) 485-5754 or at Talmage.Jordan@lacity.org ~~Heloise Froelich at (213) 485-5111 or at Heloise.Froelich@lacity.org~~ or Maria Martin at (213) 485-5753 at Maria.Martin@lacity.org for information regarding the environmental document.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
1. AESTHETICS – Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project introduces incompatible visual elements within a field of view containing a scenic vista or substantially alters a view of a scenic vista.				
Explanation: The City of Los Angeles General Plan indicates that scenic views or vistas are panoramic public views of various natural features, including the ocean, striking or unusual natural terrain, or unique urban or historic features. Public access to these views may be available from nearby parklands, private or publicly-owned sites, and public rights-of-way. The Wilshire Community Plan does not designate any specific views as scenic vistas within the Project area. The Project site is currently developed as a paved surface parking lot and is surrounded by multi-story commercial and residential buildings. The Project site does not offer views of any scenic resources and views of the Project site would not be considered scenic. Therefore, the proposed Project would not have a substantial adverse effect on a scenic vista, and no impact would occur. Reference: 13 (General Plan).				
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
Standard: A significant impact may occur where scenic resources within a state scenic highway would be damaged or removed as a result of the proposed project.				
Explanation: The Project site is bounded by 7th Street on the south and Oxford Avenue on the west, which are designated as Avenue II and Collector, respectively, in the Community Plan. There are no state designated scenic highways near the Project site. Therefore, the proposed Project would not damage scenic resources within a state scenic highway, and no impact would occur. Reference: 10 (Caltrans Scenic Highway Map), 13 (General Plan).				
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from public accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project introduces incompatible visual elements to the project site or visual elements that would be incompatible with the character of the area surrounding the project site.				
Explanation: The Project site is located in a highly urbanized area in the Koreatown neighborhood of the City of Los Angeles. As discussed in item 1(a), the Wilshire Community Plan does not designate any specific views as scenic vistas within the Project area, and the Project site does not offer views of any scenic resources. Construction activities have the potential for short-term aesthetic impacts due to grading and the storage of construction equipment and materials on-site. However, these effects would be temporary and occur within the boundaries of the Project site. The proposed Project would construct a pocket park atop an underground parking structure on a site currently developed with only a paved surface parking lot. The proposed Project would be designed to complement the library and would incorporate the western façade of the existing library into the park space with the addition of some external façade finishings, a shade trellis, and a new window/window seat. Additionally, minor repairs would be performed on the other three facades of the existing library, including cleaning, surface repairs, window updates, and re-touching, where needed. The installation of landscaping and hardscaping as part of the proposed Project would improve the visual character and quality of the site, consistent with the goals and design guidelines of the Wilshire Community Plan. Thus, constructing a new pocket park within the community would have a beneficial impact on the long-term visual quality of the Project area. Therefore, impacts				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
related to conflict with applicable zoning and other regulations governing scenic quality would be less than significant.				
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
Standard: A significant impact would occur if the proposed project caused a substantial increase in ambient illumination levels beyond the property line or caused new lighting to spill-over onto light-sensitive land uses such as residential, some commercial and institutional uses that require minimum illumination for proper function, and natural areas.				
Explanation: Project construction would occur during daylight hours and, therefore, would not require nighttime lighting. As discussed in Section II, Project Description, the proposed Project would include installation of lighting for both illumination and security purposes. Proposed lighting includes vertical post LED fixtures throughout the park; LED up-lighting in landscaped areas; integrated lighting along pathways, steps, and ramps; and LED lighting within shade structures and screen elements that would glow at night. Additionally, temporary lighting would be provided during special events. All new lighting would be focused on the Project site to prevent spillover onto surrounding areas. Additionally, the installation of all new lighting would occur in accordance with the City of Los Angeles Municipal Code (LAMC). Adherence to existing regulations would ensure that impacts related to light and glare would be less than significant.				
2. AGRICULTURE AND FORESTRY RESOURCES – Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
Standard: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. A significant impact may occur if the proposed project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use.				
Explanation: No prime or unique farmland, or farmland of statewide importance exists within the project area or vicinity. The project site is not located on or near any property zoned or otherwise intended for agricultural uses. Therefore, no impact to state-designated agricultural land would occur. Reference: 5 (Farmland Mapping and Monitoring Program California Important Farmland Finder)				
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project were to result in the conversion of land zoned for agricultural use, or indicated under a Williamson Act contract, from agricultural use to another non-agricultural use.				
Explanation: The Project site and adjacent parcels are not zoned or developed for agricultural uses. Furthermore, the only land in Los Angeles County currently under a Williamson Act contract is located on Santa Catalina Island, approximately 45 miles southwest of the Project site. The proposed Project would not conflict with existing zoning or a Williamson Act contract. Therefore, no impact would occur. Reference: 6 (California Department of Conservation Williamson Act Maps)				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
Standard: In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.				
Explanation: The majority of the Project site is zoned CR for limited commercial uses, while the southernmost strip of the Project site is zoned P for automobile parking. No portion of the Project site is zoned for forest land or timberland, and no forest lands are located on or near the Project site. Therefore, the proposed Project would not conflict with existing zoning for, or cause rezoning of forest land or timberland. No impact would occur. Reference: 14 (ZIMAS).				
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
Standard: In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.				
Explanation: Refer to item 2(c) above. No impact would occur.				
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural use?	☐	☐	☐	☒
Standard: A significant impact may occur if a project results in the conversion of farmland to another non-agricultural use.				
Explanation: Refer to items 2(a) and 2(b) above. No impact would occur.				
3. AIR QUALITY – Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
Standard: A significant impact may occur if the project was inconsistent with or obstruct the implementation of the Air Quality Element of the City's General Plan or the Air Quality Management Plan (AQMP).				
Explanation: The following analysis addresses the consistency with applicable SCAQMD and Southern California Association of Governments (SCAG) policies, including the SCAQMD's 2016 Air Quality Management Plan (AQMP) and growth projections within the SCAG 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). In accordance with the procedures established in the SCAQMD's CEQA Air Quality Handbook, the following criteria are required to be addressed in order to determine the consistency with applicable SCAQMD and SCAG policies: • Would the project result in any of the following: o An increase in the frequency or severity of existing air quality violations; or o Cause or contribute to new air quality violations; or				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact

- o Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

- Would the project exceed the assumptions utilized in preparing the AQMP?
  - o Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
  - o Does the Project include air quality mitigation measures; or
  - o To what extent is Project development consistent with the AQMP land use policies?

The following analysis addresses the first consistency criterion, which is related to violations of the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). Construction of the proposed Project would have a potentially significant air quality impact under this criterion if maximum daily emissions of any regulated pollutant exceeded the applicable SCAQMD air quality significance thresholds. Daily emissions of regulated pollutants were quantified for each phase of construction activity using the California Emissions Estimator Model (CalEEMod, version 2016.3.1). The estimate of fugitive dust emissions account for Rule 403 compliance. Examples of Rule 403 compliance include: a) All exposed areas will be frequently watered to reduce the generation of dust, and b) Vehicle speed of construction vehicles/equipment in exposed areas (i.e., unpaved access) shall be reduced to reduce the generation of dust.

Table 1 shows a comparison of the maximum daily emissions during each phase of construction to the applicable SCAQMD air quality significance thresholds. Maximum daily emissions of air pollutants that would be generated by proposed Project construction activities would not exceed any applicable regional or localized threshold values. Impacts would be less than significant, and no mitigation is required.

With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2016-2040 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these three criteria.

- Is the Project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

Implementation of the proposed Project would not introduce new residential or commercial land uses to the Project area, and therefore population and employment projections for the region would not be affected. The proposed Project would not have any potential to result in growth that would exceed the projections incorporated into the AQMP or the SCAG 2016-2040 RTP/SCS.

- Does the Project implement feasible air quality mitigation measures?

The proposed Project would comply with all applicable regulatory standards (e.g., SCAQMD Rule 403) as required by the SCAQMD. As demonstrated in the air quality analysis, the proposed Project would not result in significant air quality impacts and no mitigation measures are required to reduce emissions. As such, the proposed Project meets this AQMP consistency criterion.

- To what extent is project development consistent with the land use policies set forth by the City of Los Angeles?

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact

Table 1
Estimated Daily Construction Emissions

Phase	Daily Emissions (Pounds Per Day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
DEMOLITION						
On-Site Emissions	2.7	28.5	17.6	<0.1	1.6	1.3
Off-Site Emissions	0.3	0.2	2.4	<0.1	0.7	0.2
Total	***3.0***	***28.7***	***20.0***	***<0.1***	***2.3***	***1.5***
SITE PREPARATION						
On-Site Emissions	1.7	18.0	12.0	<0.1	3.3	2.2
Off-Site Emissions	0.7	11.9	5.1	<0.1	1.4	0.4
Total	***2.4***	***29.9***	***17.1***	***<0.1***	***4.7***	***2.6***
SITE GRADING						
On-Site Emissions	2.9	31.0	17.4	<0.1	4.0	2.7
Off-Site Emissions	0.6	10.7	4.8	<0.1	1.3	0.4
Total	***3.5***	***41.7***	***22.2***	***<0.1***	***5.3***	***3.1***
BUILDING CONSTRUCTION						
On-Site Emissions	1.8	19.4	15.1	<0.1	0.9	0.8
Off-Site Emissions	0.5	1.2	4.2	<0.1	1.2	0.3
Total	***2.3***	***20.6***	***19.3***	***<0.1***	***2.1***	***1.1***
PAVING						
On-Site Emissions	0.7	6.6	7.0	<0.1	0.3	0.3
Off-Site Emissions	0.3	0.2	2.2	<0.1	0.7	0.2
Total	***1.0***	***6.8***	***9.2***	***<0.1***	***1.0***	***0.5***
ARCHITECTURAL COATING						
On-Site Emissions	0.8	4.4	5.8	<0.1	0.2	0.2
Off-Site Emissions	0.3	0.2	2.2	<0.1	0.7	0.2
Total	***1.1***	***4.6***	***7.0***	***<0.1***	***0.9***	***0.4***
PAVING+ARCHITECTURAL COATING OVERLAP						
On-Site Emissions	1.5	11.0	12.8	<0.1	0.5	0.5
Off-Site Emissions	0.6	0.4	4.4	<0.1	1.4	0.4
Total	***2.1***	***11.4***	***17.2***	***<0.1***	***1.9***	***0.9***
REGIONAL ANALYSIS						
Maximum Regional Daily Emissions	**3.5**	**41.7**	**22.2**	**<0.1**	**5.3**	**3.1**
Regional Significance Threshold	75	100	550	150	150	55
Exceed Regional Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
LOCALIZED ANALYSIS						
Maximum Localized Daily Emissions	**--**	**31.0**	**17.6**	**--**	**4.0**	**2.7**
Localized Significance Threshold	--	74	680	--	5	3
Exceed Localized Threshold?	**--**	**No**	**No**	**--**	**No**	**No**

Notes: Emissions modeling files can be found in the Appendix to the Air Quality and Greenhouse Gas Emissions Impact Study.
VOC=volatile organic compounds; NO_X=nitrogen oxides; CO=carbon monoxide; SO_X=sulfur oxides; PM_{10}= respirable particulate matter ten microns or less in diameter; $PM_{2.5}$=fine particulate matter 2.5 microns or less in diameter
Source: TAHA, 2019.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact

Table 2
Estimated Daily Operational Emissions

Source Category	Daily Emissions (Pounds Per Day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area (Landscaping)	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
New Vehicle Trips	--	--	--	--	--	--
ANALYSIS						
Regional Total	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Note: VOC=volatile organic compounds; NO_X=nitrogen oxides; CO=carbon monoxide; SO_X=sulfur oxides; PM_{10}= respirable particulate matter ten microns or less in diameter; $PM_{2.5}$=fine particulate matter 2.5 microns or less in diameter
Source: TAHA, 2019.

The proposed Project would be consistent with the City of Los Angeles General Plan. The Project site is zoned CR (Limited Commercial) and P (Automobile Parking) and designated for Commercial uses in the City of Los Angeles General Plan, which would allow for the construction of the park and underground parking structure. The Project site is within the Wilshire Community Plan area of the City of Los Angeles General Plan. The Project would be consistent with goals and objectives within the Community Plan, namely to facilitate the creation of small neighborhood serving pocket parks within highly urbanized areas as potential parcels and funding become available. Therefore, because the Project would be consistent with the goals and policies of the Community Plan and would be consistent with existing zoning, the Project is considered consistent with the General Plan.

Implementation of the proposed Project would not interfere with air pollution control measures listed in the 2016 AQMP and would not conflict with the goals of the General Plan Air Quality Element. The impact would be less than significant. Reference 22 (Air Quality and Greenhouse Gas Emissions Impact Study).

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

Standard: A significant impact may occur if the proposed project would result in a cumulatively considerable net increase of a criteria pollutant for which the South Coast Air Basin exceeds federal and state ambient air quality standards and has been designated as an area of non-attainment by the USEPA and/or California Air Resources Board. The South Coast Air Basin is a non-attainment area for carbon monoxide, ozone (O_3), particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$).

Explanation:

Construction

The South Coast Air Basin (SCAB) is designated as nonattainment of the CAAQS and NAAQS for O_3, PM_{10}, and $PM_{2.5}$. Therefore, there is an ongoing regional cumulative impact associated with these air pollutants. Taking into account the existing environmental conditions, the SCAQMD propagated guidance that an individual project can emit allowable quantities of these pollutants on a regional scale without significantly contributing to the cumulative impacts.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact

As discussed above and shown in Table 1, air pollutant emissions associated with construction of the proposed Project would not exceed any applicable SCAQMD air quality thresholds of significance. Despite the region being in nonattainment of the ambient air quality standards for O_3, PM_{10}, and $PM_{2.5}$, the SCAQMD does not consider individual project emissions of lesser magnitude than the mass daily thresholds to be cumulatively considerable. Therefore, the proposed Project would not result in a cumulatively considerable net increase of nonattainment pollutants and the impact would be less than significant. No mitigation is required.

Operation

Implementation of the proposed Project would introduce a new pocket park and underground parking structure to the Koreatown neighborhood, and operational air pollutant emissions would be substantially below the applicable SCAQMD mass daily thresholds. Operation of the pocket park and underground parking structure would not introduce a substantial source of long-term O_3 precursor emissions or particulate matter emissions for which the SCAB is currently designated nonattainment. As discussed above, the SCAQMD has propagated guidance that the project-specific mass daily thresholds may be used as a reference metric to evaluate the potential for cumulatively considerable net increases in nonattainment pollutants. If the SCAQMD mass daily thresholds were exceeded, further analysis would be warranted to ensure that emissions would not be cumulatively considerable. However, as shown in Table 2, operation of the proposed Project would not exceed the SCAQMD mass daily threshold for VOC, NO_X, or particulate matter, and the impact would be less than significant. Reference 22 (Air Quality and Greenhouse Gas Emissions Impact Study).

c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

Standard: A significant impact may occur if construction or operation of the proposed project generated pollutant concentrations to a degree that would significantly affect sensitive receptors.

Explanation:

Construction

The SCAQMD devised its Local Significance Thresholds (LST) values to prevent the occurrence of localized hot spots of criteria pollutant concentrations at sensitive receptor locations surrounding the Project site. The LST values were determined using emissions modeling based on ambient air quality measured throughout the SCAB. If maximum daily emissions remain below the LST values during construction activities, it is highly unlikely that air pollutant concentrations in ambient air would reach substantial levels sufficient to create public health concerns for sensitive receptors. As shown in Table 1, maximum daily emissions of criteria pollutants and O_3 precursors from sources located on the Project site would not exceed any applicable LST values. Therefore, construction of the proposed Project would not result in exposure of sensitive receptors to substantial concentrations of criteria pollutants.

With regards to emissions of air toxics, carcinogenic risks, and non-carcinogenic hazards, the use of heavy duty construction equipment and haul trucks during construction activities would release diesel particulate matter (PM) to the atmosphere through exhaust emissions. Diesel PM is a known carcinogen, and extended exposure to elevated concentrations of diesel PM can increase excess cancer risks in individuals. However, carcinogenic risks are typically assessed over timescales of several years to decades, as the carcinogenic dose response is cumulative in nature. Short term exposures to diesel PM would have to involve extremely high concentrations in order to exceed the SCAQMD Air Quality Significance Threshold of 10 excess cancers per million.

Over the course of construction activities, even under the most conservative assumption that all equipment would be used continuously for eight hours per day, average diesel PM emissions would be approximately

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact

0.44 pounds per day. Therefore, it is highly unlikely that diesel PM concentrations would be of any public health concern during the 18-month construction period, and diesel PM emissions would cease upon completion of construction activities. Therefore, the proposed Project would result in a less than significant impact related to construction toxic air contaminants.

Operation

The proposed Project would introduce a new recreational facility to the Project area and would replace the existing surface parking lot with an underground parking structure. The proposed Project does not include an industrial component that would constitute a new substantial stationary source of operational air pollutant emissions, nor does it include a land use that would generate truck trips within the region. There would be no substantial source of air toxic emissions. Additionally, as shown in Table 2, daily emissions of criteria pollutants would remain far below the applicable SCAQMD Air Quality Significance Thresholds. Therefore, the proposed Project would result in a less than significant impact related to operational toxic air contaminants. Reference 22 (Air Quality and Greenhouse Gas Emissions Impact Study).

e) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Standard: A significant impact may occur if construction or operation of the proposed project generated other emissions that would adversely impact a substantial number of people.

Explanation:

Construction

The only source of potentially impactful construction emissions other than criteria pollutants, O_3 precursors, and toxic air contaminants (TACs) would be emissions leading to odors. Potential sources that may produce objectionable odors during construction activities include equipment exhaust, application of asphalt and architectural coatings, and other interior and exterior finishes. Odors from these sources would be localized and generally confined to the immediate area surrounding the Project site. The proposed Project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. In addition, as construction-related emissions dissipate away from the construction area, the odors associated with these emissions would also decrease and would be quickly diluted. Therefore, the proposed Project would result in a less than significant impact related to construction odors.

Operation

Implementation of the proposed Project would introduce a new pocket park to the Koreatown neighborhood and would replace the existing surface parking lot with an underground parking structure. The only source of potentially impactful emissions other than criteria pollutants, O_3 precursors, and TACs would be emissions leading to odors. According to the SCAQMD *CEQA Air Quality Handbook*, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The Project site would not be developed with land uses that are typically associated with odor complaints. On-site trash receptacles would have the potential to create adverse odors. Trash receptacles would be located and maintained in a manner that promotes odor control in accordance with the Los Angeles Clean Streets program and no adverse odor impacts are anticipated from these types of land uses. Therefore, the proposed Project would result in a less than significant impact related to operational odors. Reference 22 (Air Quality and Greenhouse Gas Emissions Impact Study).

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
4. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐

Standard: A significant impact may occur if the proposed project would remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the state or federal regulatory agencies cited.

Explanation: Special-status plant species include those listed as Endangered, Threatened, Rare or those species proposed for listing by the US Fish and Wildlife Service (USFWS) under the federal Endangered Species Act (FESA), those listed by California Department of Fish and Wildlife (CDFW) under the California Endangered Species Act (CESA), and the California Native Plant Society (CNPS). The CNPS inventory is sanctioned by the CDFW and essentially serves as the list of candidate plant species for state listing. CNPS's California Rare Plant Ranks (CRPR) 1B and 2 species are considered eligible for state listing as endangered or threatened.

Special-status wildlife species include those listed by the USFWS under FESA and by CDFW under CESA. USFWS officially lists species as either threatened, endangered, or as candidates for listing. Additional species receive federal protection under the Bald Eagle Protection Act (e.g., bald eagle, golden eagle), the Migratory Bird Treaty Act (MBTA), and state protection under CEQA Section 15380(d).

A search of relevant regional databases for special-status biological resources in the vicinity of the Project area was conducted. The property occurs just east of center on the U.S. Geological Survey's Hollywood, California quadrangle. A search of this quadrangle was made of the CDFW CNDDB and CNPS electronic inventory, as well as USFWS online database. A review of these databases indicates that a combined total of 21 plant species from the CNDDB and CNPS, and 15 wildlife species from the CNDDB have been documented from the Hollywood Quadrangle. The CNDDB and CNPS lists are included in Appendix B.

Construction

The Project site is located in the highly urbanized Koreatown neighborhood of the City of Los Angeles and is currently developed with a paved surface parking lot. No native plant communities occur on-site. Plants occurring on-site are nonnative, including ficus (*Ficus carica*) and carob (*Ceratonia silique*) trees, which occur along the perimeter of the Project site, generally between sidewalks and adjacent roadways, and Indian hawthorn (*Raphiolepis indica*) shrubs, which also line sidewalks. These three ornamental species are the only plant species occurring on-site. Implementation of the proposed Project would result in the removal of two carob and two ficus trees, which would subsequently be replaced as part of the proposed Project. These trees are not state or federally listed plants nor are they locally protected, and the removal and replacement of these ornamental trees do not constitute a significant direct impact. Indirect impacts to special-status plant species occurring outside the Project site could result from construction-related habitat loss and modification of sensitive natural communities related to dust, noise, stormwater runoff, and through the potential spread of noxious and invasive plant species into these communities. Such impacts would be considered significant; however, suitable habitat for special-status plants is not present in the urban environment surrounding the Project site. Additionally, implementation of the BMPs outlined in Section II. E., Construction Schedule and Procedures, related to fugitive dust and erosion control, would minimize the potential for indirect impacts to special-status plants. With implementation of these construction BMPs, impacts to special-status plant species would be less than significant.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact

A biological resources survey was conducted at the Project site. Wildlife species observed within the Project site and surrounding area included bird species that are common in and adapted to urban environments, including American crow (*Corvus brachyrhynchos*), mourning dove (*Zenaida macroura*), rock dove (*Columba livia*), house sparrow (*Passer domesticus*), and western gull (*Larus occidentalis*). No special-status wildlife species were observed.

Elements of proposed Project construction could potentially affect wildlife. Tree removal and ground disturbance activities could result in the mortality of individual wildlife species, and species with limited mobility or that occupy burrows within the construction zone could be crushed during proposed Project activities. Additionally, short-term indirect effects on wildlife, primarily urban bird species, would occur due to noise disturbances, increased human activity, and vibrations caused by heavy equipment, which would cause wildlife to avoid the immediate construction area. However, no federal or State-listed wildlife species have been identified on-site and potentially suitable habitat for such species is absent from the Project site and surrounding area. Implementation of the BMPs outlined in Section II. E., Construction Schedule and Procedures, related to fugitive dust, erosion control, and noise, would minimize the potential for indirect impacts to special-status plants. Ornamental trees in the Project site and surrounding area provide potentially suitable nesting habitat for urban bird species. As a result, birds protected by the MBTA and the CFGC have the potential to nest in and near the Project site. If tree removal occurs during the nesting bird season, the direct impact to birds protected by the MBTA would be significant. By avoiding vegetation removal during the nesting bird season or adhering to avoidance and minimization measures outlined in mitigation measure BIO-1, the direct impacts of vegetation removal on nesting birds or their associated habitat would be reduced. With implementation of construction BMPs and mitigation measure BIO-1, construction impacts to special-status wildlife species would be less than significant.

Mitigation Measure

With the potential for nesting birds protected under the MBTA and CFGC to occur in ornamental trees within the Project site and surrounding area, implementation of the avoidance and minimization measures presented below would mitigate potential impacts to nesting birds should construction be initiated during the bird breeding season (February 15 through September 1).

BIO-1. Tree removal during proposed Project construction shall occur outside of the nesting bird season (generally February 15 through September 1). If avoiding the nesting season is not practicable, the following additional measures shall be employed:

- A pre-construction nesting survey shall be conducted by a qualified biologist within 3 days prior to the start of construction activities to determine whether active nests are present within or directly adjacent to the construction zone. All nests found shall be recorded.
- If construction activities must occur within 300 feet of an active nest of any passerine bird or within 500 feet of an active nest of any raptor, with the exception of an emergency, a qualified biologist shall monitor the nest on a weekly basis, and the activity shall be postponed until the biologist determines that the nest is no longer active.
- If the recommended nest avoidance zone is not feasible, the qualified biologist shall determine whether an exception is possible and obtain concurrence from the resource agencies before construction work can resume within the avoidance buffer zone. All work shall cease within the avoidance buffer zone until either agency concurrence is obtained or the biologist determines that the adults and young are no longer reliant on the nest site.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Operation Only ornamental vegetation would occur on-site and special-status plants and wildlife are not expected to occur in the Project site or surrounding area due to a lack of suitable habitat. Therefore, no impact to special-status species would occur during operation and routine maintenance of the proposed Project. Reference: 2 (Biological Resources Letter Report).				
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
Standard: A significant impact may occur if riparian habitat or any other sensitive natural community were to be adversely modified				
Explanation: Implementation of the proposed Project would not result in direct or indirect impacts to any sensitive natural communities. No sensitive natural communities occur within the Project site and surrounding area. Additionally, sensitive aquatic habitats under regulatory jurisdiction of the US Army Corps of Engineers, CDFW, and California Regional Water Quality Control Board do not occur in the Project site or surrounding area. Therefore, no impacts to sensitive natural communities would occur. Reference: 2 (Biological Resources Letter Report).				
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
Standard: A significant impact may occur if state or federally protected wetlands, as defined by Section 404 of the *Clean Water Act* would be modified or removed.				
Explanation: No wetlands occur within the Project site. Therefore, the Proposed Project would not result in a substantial adverse effect on protected wetlands, and no impact would occur. Reference: 2 (Biological Resources Letter Report), 22 (U.S. Fish and Wildlife Service National Wetlands Inventory)				
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
Standard: A significant impact may occur if the proposed project interferes or removes access to a migratory wildlife corridor or impedes the use of native wildlife nursery sites.				
Explanation: The Project site does not serve as a regional wildlife corridor and as a result, direct impacts to a regional wildlife movement corridor would not occur. Proposed Project construction activities (i.e., increased noise, human presence, vibration) would likely result in bird species avoiding the immediate Project vicinity. Such indirect effects would be temporary in nature and restricted to the proposed Project construction time period. Implementation of the BMPs outlined in Section II. E., Construction Schedule and Procedures, related to fugitive dust, erosion control, and noise, and adhering to the avoidance and minimization measures provided in mitigation measure BIO-1 (see item 4(a) above) would minimize direct and indirect impacts to localized bird movement. With implementation of construction BMPs and mitigation measure BIO-1, construction impacts to a wildlife movement corridor would be less than significant. No impacts to wildlife movement would occur during Project operation. Reference: 2 (Biological Resources Letter Report).				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project would cause an impact that is inconsistent with local regulations pertaining to biological resources.				
Explanation: Native tree species that measure four inches or more in cumulative diameter, four and one-half feet above the ground, including native oak (*Quercus* spp.), southern California black walnut (*Juglans californica* var. *californica*), western sycamore (*Platanus racemosa*), and California bay (*Umbellularia californica*) are protected by the LAMC. Any tree grown or held for sale by a nursery, or trees planted or grown as part of a tree planting program, are not included in the definition of a protected tree. None of the trees listed above occur on the Project site. As previously discussed, implementation of the proposed Project would result in the removal of two carob and two ficus trees (both ornamental species), which would subsequently be replaced as part of the proposed Project. LARAP also has a tree replacement policy that can be found within the LARAP's *Tree Care Manual*. The LARAP tree replacement policy requires "whenever trees are removed, the existing trees' aggregate diameter, measured at breast height shall be replaced at an equal or greater rate of caliper of new trees." The removal and replacement of ornamental trees at the Project site would occur in compliance with the City's tree removal and replacement policies, as applicable. Adherence to existing regulations would ensure that impacts to protected trees would be less than significant. Reference: 13 (General Plan), and 15 (LARAP Tree Care Manual).				
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?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project would be inconsistent with mapping or policies in any conservation plans of the cited type.				
Explanation: There are no adopted Habitat or Natural Community Conservation Plans applicable to the Project site or the surrounding area. Therefore, neither construction nor operation of the proposed Project would conflict with an approved conservation plan, and no impact to such a plan would occur. Reference: 9 (CDFW Conservation Plans Map), 13 (General Plan).				
5. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to California Code of Regulations Section 15064.5?	☐	☐	☐	☒
Standard: A significant impact may result if the proposed project caused a substantial adverse change to the significance of a historical resource (as identified above).				
Explanation: A resource is generally considered "historically significant" if the resource meets at least one of the four criteria for listing on the California Register of Historical Resources (CRHR) (Public Resources Code Section 5024.1[a]). The CRHR is used as a guide by state and local agencies, private groups, and citizens to identify the state historical resources and to include which properties are to be protected, to the extent prudent and feasible, from substantial adverse change. The CRHR evaluation criteria are similar to the National Register of Historic Places (NRHP) criteria. For a property to be eligible for inclusion in the CRHR, it must meet one or more of the following criteria: • It is associated with events that have made a significant contribution to the broad patterns of California history and cultural heritage; • It is associated with the lives of persons important in our past;				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact

- It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- It has yielded, or may be likely to yield, important information in prehistory or history.

Although the NRHP standard includes the evaluation of resources that are 50 years old or older, the California Office of Historic Preservation (OHP) endorses recording and evaluating resources over 45 years of age to accommodate the five-year lag in the planning process.

An archival records search for the Project area was conducted at the South Central Coastal Information Center. Previously conducted cultural resources investigations and previously identified cultural resources were reviewed as part of this investigation. A 0.5-mile radius around the Project area was examined. Archival research indicates that none of the Project area has been previously studied. However, numerous studies have been conducted within a 0.5-mile radius. A pedestrian survey was conducted within all portions of the Project area to identify and record cultural resources that are at least 45-years old and evaluate any discovered resources for historical significance based on criteria for listing in the CRHR.

Based on the results of the archival research and field survey, there are no historic architectural resources within the Project area. The only built environment resource located within the Project area is the 1981 Pio Pico Koreatown Branch Library building. Properties less than 50 years of age must be exceptionally important to be considered eligible for listing in the CRHR or NRHP. The 50-year age requisite is a general estimate of time needed to develop a historical perspective to evaluate a property's significance within its context. The Pio Pico Koreatown Branch Library is less than 50 years old, and historical research conducted for the proposed Project did not indicate the property was associated with any significant events or trends. Therefore, no impact to historical resources would occur with implementation of the proposed Project. Reference 3 (Cultural Resources Assessment).

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations Section 15064.5?	☐	☒	☐	☐

Standard: A significant impact may occur if the proposed project were to cause a substantial adverse change in the significance of an archaeological resource which falls under the CEQA Guidelines section cited above.

Explanation: Based on the results of the archival research and field survey, there is low potential that known archaeological resources will be encountered during ground-disturbing activities for the proposed Project. However, there is potential to encounter previously undiscovered archaeological resources during construction activities. According to the geotechnical investigation prepared for the proposed Project, the materials underlying the Project site include artificial fill and disturbed deposits from one or more local sites up to a depth of approximately 5 to 7.5 feet below the ground surface. Located below that depth are undisturbed native Pleistocene (approximately 2.6 million to 11.7 thousand years old) deposits, which predate Native American settlement of the area.

Though no previously identified archaeological resources associated with Native American culture have been identified within a 0.5-mile radius of the Project area, and no documented tribal cultural resources were identified in the archival research and outreach performed thus far, the Native American representatives contacted for the Project indicated that the area is potentially sensitive for tribal cultural resources due to the presence of nearby local historical waterways that are no longer present. Mitigation measures CUL-1 and CUL-2 could be implemented during construction and would include further consultation with Native American parties. With the implementation of mitigation measures CUL-1 and CUL-2, and ongoing consultation with Native American representatives, impacts to archeological resources, including tribal cultural resources, would be less than significant.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Mitigation Measures				
CUL-1. A qualified archaeological monitor shall be present during all ground-disturbing activities within the upper 7.5 feet of disturbed local materials to evaluate and determine appropriate treatment for the resource in accordance with 36 CFR § 800.13(b) (3) and PRC Section 21083.2(i). The onsite archaeological and any Native American monitor(s), as described below shall train the construction crews in regard to identifying potential archaeological resources (including Native American artifacts). The archaeological monitor shall have the authority to stop work if archaeological and/or Native American resources are found within the disturbed local deposits in the upper 7.5 feet of excavated material. If any Native American cultural material is encountered within the upper 7.5 feet of materials, consultation with interested Native American parties will be conducted to apprise them of any such findings and solicit any comments they may have regarding appropriate treatment and disposition of the resources, as per CUL-2. If archaeological resources are encountered during ground-disturbing activities within the undisturbed native Pleistocene material, below 7.5 feet from ground surface, work shall be temporarily halted in the vicinity of the find and the archaeologist shall be called to the Project area to examine and evaluate the resource in accordance with the provisions of the National Historic Preservation Act (NHPA) and CEQA, including any Native American monitors, as per mitigation measure CUL-2.				
CUL-2. A trained Native American consultant or consultants shall be engaged to monitor ground-disturbing activities as described in CUL-1. The consultant or consultants shall be selected from the interested Native American parties who consulted on the project. This selection and monitoring shall occur on an as-needed basis as determined by BOE in consultation with interested tribes and shall be intended to ensure that Native American concerns are taken into account during the construction process. The Native American consultant shall report findings to BOE or its archaeological consultant, who will disseminate the information to the consulting Native American parties. The Native American parties identified by the NAHC shall be consulted regarding the treatment and final disposition of any materials of Native American origin found during the course of the project, if any, and will assist BOE in determining whether these materials constitute tribal cultural resources.				
Reference 3 (Cultural Resources Assessment).				
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐
Standard: A significant impact may occur if grading or excavation activities associated with the proposed project would disturb interred human remains.				
Explanation: No known burial sites are located within the Project site and the area has been previously disturbed with development at the Project site. No evidence of human remains was observed during the site survey and, as such, human remains are not expected to be encountered during construction. If human remains are discovered, work in the immediate vicinity of the discovery will be suspended and the Los Angeles County Coroner contacted. If the remains are deemed Native American in origin, the Coroner will contact the Native American Heritage Commission and identify a Most Likely Descendant pursuant to Public Resources Code Section 5097.98 and California Code of Regulations Section 15064.5. Work may be resumed at the landowner's discretion but will only commence after consultation and treatment have been concluded. Work may continue on other parts of the proposed Project site while consultation and treatment are conducted. Compliance with existing regulations would ensure a less than significant impact to human remains. Reference 3 (Cultural Resources Assessment).				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
6. ENERGY – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project would place additional capacity requirements on local and regional energy supplies.				
Explanation: Energy, primarily as diesel fuel for equipment and gasoline for equipment and vehicle trips, would be used during construction of the proposed Project. Energy expenditures during construction would be temporary, lasting for approximately 18 months. The proposed Project would generate a total of 225 daily one-way weekday vehicle trips, which would require gasoline. Limitations on idling of vehicles and equipment and requirements that equipment be properly maintained would result in fuel savings. California regulations (California Code of Regulations Title 13, Sections 2449(d)(2) and 2485) limit idling from both on-road and off-road diesel-powered equipment and are enforced by ARB. Also, given the cost of fuel, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction. On-site construction activities would occur during daytime hours, so it is anticipated that the use of construction lighting would be minimal. Due to the temporary nature of construction and the financial incentives for developers and contractors to use energy-consuming resources in an efficient manner, the construction phase of the proposed Project would not result in wasteful, inefficient, and unnecessary consumption of energy. The impact would be less than significant. During operations, the pocket park would be a passive use. The underground parking structure would require lighting, and the elevator would only require electricity during the library's operational hours. In addition, area lighting would be installed throughout the park using LED fixtures, which is considered energy-efficient technology. Area lighting would replace the existing lighting of the existing surface parking lot of the library. Temporary lighting would also be provided during special events. The proposed Project would comply with applicable provisions of the City's Green Building Program, Los Angeles Green Building Code, and Existing Buildings Energy and Water Efficiency Ordinance. Therefore, the proposed Project would not result in the use of energy in a wasteful manner or inefficient manner during operations. The impact would be less than significant.				
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project were inconsistent with the state or local plans for renewable energy or energy efficiency.				
Explanation: The proposed Project would follow applicable energy standards and regulations during construction. The proposed Project includes operation of a pocket park and underground parking structure and would not include land uses that require substantial energy. During operation, nominal amounts of energy would be required for lighting for the park and the underground parking structure, and electricity for the elevator during the library's operational hours. Existing electricity service is provided to the site by the City of Los Angeles Department of Water and Power (LADWP), and the proposed Project would not require a substantial increase in energy beyond existing conditions. As such, impacts related to conflicts with plans for renewable energy or energy efficiency are less than significant.				
7. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent	☐	☐	☒	☐

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?				
Standard: A significant impact may occur if the proposed project were located within a state-designated Alquist-Priolo Zone or other designated fault zone and appropriate building practices were not followed.				
Explanation: The Project site is not located in an Alquist-Priolo Earthquake Fault Zone. The Project site is located in a seismically active area, as is most of southern California. However, no active faults are known to cross the Project site. The proposed Project would be designed and constructed in accordance with all applicable federal, state, and local codes relative to seismic criteria. Compliance with existing regulations would ensure a less than significant impact related to fault rupture. Reference: 13 (General Plan Safety Element), 18 (Geotechnical Investigation Report).				
ii) Strong seismic ground shaking?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project design did not comply with building code requirements intended to protect people from hazards associated with strong seismic ground shaking.				
Explanation: Although the Project site is located in a seismically active area and ground shaking due to nearby and distant earthquakes would be anticipated, the proposed Project would be required to be designed and constructed in accordance with the latest engineering codes. Additionally, the proposed Project would be designed and constructed in accordance with the recommendations provided in the Geotechnical Investigation Report and Engineer of Record Report prepared for the proposed Project. With adherence to all applicable building codes and recommendations in the Geotechnical Investigation Report and the Engineer of Record Report, impacts related to strong seismic ground shaking would be less than significant. Reference: 13 (General Plan Safety Element), 18 (Geotechnical Investigation Report).				
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project would be located in an area identified as having a high risk of liquefaction and appropriate design measures required within such designated areas were not incorporated into the project.				
Explanation: Liquefaction occurs when water saturated sediments are subjected to extended periods of shaking. Pressure increases in the soil pores temporarily alter the soil state from solid to liquid. Liquefied sediments lose strength, in turn causing the failure of adjacent infrastructure, including bridges and buildings. Whether a soil would resist liquefaction depends on a number of factors, including grain size, compaction and cementation, saturation and drainage, characteristics of the vibration, and the occurrence of past liquefaction. Granular, unconsolidated, saturated sediments are the most likely to liquefy, while dry, dense or cohesive soils tend to resist liquefaction. Liquefaction is generally considered to be a hazard where the groundwater is within 40 to 30 feet of the ground surface. With proper soil drainage, the pore pressure, which builds up when ground motion shakes unconsolidated soil, would be more easily dissipated; thus, soils with proper drainage are less likely to liquefy. The Project site is not located within a state- or City-designated liquefaction area. However, additional site testing was conducted as part of the Geotechnical Investigation Report prepared for the proposed Project. Based on these analyses, the Geotechnical Investigation Report states that there is potential for liquefaction to occur on a localized basis at the Project site within areas containing silty sand/sandy silt materials. As previously discussed, the proposed Project would be designed and constructed in accordance with all applicable codes relative to seismic criteria, and recommendations provided in the				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Geotechnical Investigation Report and the Engineer of Record Report prepared for the proposed Project. With adherence to all applicable building codes and recommendations in the Geotechnical Investigation Report and the Engineer of Record Report, impacts related to liquefaction would be less than significant. Reference: 7 (Seismic Hazard Zones Map, Hollywood Quadrangle), 13 (General Plan Safety Element), 18 (Geotechnical Investigation Report).				
iv) Landslides?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project were located in a hillside area with soil conditions that would suggest high potential for sliding and appropriate design measures were not implemented.				
Explanation: The Project site is located in an area that is relatively flat and is not identified as a potential landslide hazard area by the California Department of Mines and Geology. Additionally, the Project site is not located within a City-designated hillside area or earthquake induced landslide area. Therefore, the proposed Project would not expose people or structures to potential adverse effects from landslides. No impact to landslides would occur. Reference: 7 (Seismic Hazard Zones Map, Hollywood Quadrangle), 13 (General Plan Safety Element).				
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project were to expose large areas to the erosion effects of wind or water for a prolonged period of time.				
Explanation: The proposed project would include ground-disturbing activities, such as excavation, grading and compaction of soil, landscaping, and paving. These activities could result in the potential for erosion to occur at the project site, though soil exposure would be temporary and short-term in nature. As discussed in Section II.E, Construction Schedule and Procedures, above, the proposed Project would implement construction erosion BMPs, which may include temporary desilting basins; silt fences; gravel bag barriers; temporary soil stabilization with mattresses and mulching; temporary drainage inlet protection; and diversion dikes and interceptor swales. With implementation of appropriate construction BMPs, impacts associated with soil erosion of the loss of topsoil would be less than significant.				
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project alternatives were built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property.				
Explanation: See items 7(a)(iii) and 7(a)(iv) above. With adherence to all applicable building codes and recommendations in the Geotechnical Investigation Report and the Engineer of Record Report, impacts related to liquefaction would be less than significant. Reference: 7 (Seismic Hazard Zones Map, Hollywood Quadrangle), 13 (General Plan Safety Element), 18 (Geotechnical Investigation Report).				
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project were built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property.				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Explanation: Expansive soils are clay-based soils that tend to increase in volume as they absorb water and shrink as water is drawn away. Expansive soils can result in damage to structures, slabs, pavements, and retaining walls if wetting and drying of the soil does not occur uniformly across the entire area. According to the Geotechnical Investigation prepared for the proposed Project, the subsurface materials at the Project site have low potential for expansion based on changes in water content; however, expansion may occur as a result of overburden pressure from excavation and/or heaving/surging from sides caused by a change in overburden pressure during excavation. As previously discussed, the proposed Project would be designed and constructed in accordance with all applicable codes relative to seismic criteria, and recommendations provided in the Geotechnical Investigation Report and the Engineer of Record Report prepared for the proposed Project. With adherence to all applicable building codes and recommendations in the Geotechnical Investigation Report and Engineer of Record Report, impacts related to expansive soils would be less than significant. Reference 18 (Geotechnical Investigation Report).				
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project were built on soils that were incapable of adequately supporting the use of septic tanks or alternative wastewater disposal system, and such a system was proposed.				
Explanation: The Project area is served by the City's wastewater collection, conveyance, and treatment systems, and no alternative wastewater disposal systems are proposed as part of the Project. No impact would occur. Reference: 15 (NavigateLA).				
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
Standard: A significant impact may occur if grading or excavation activities associated with the proposed project would disturb unique paleontological resources or unique geologic features.				
Explanation: The Project site is currently developed with a paved surface parking lot and has been disturbed by previous development. Excavations for the proposed underground parking structure would reach maximum depths of approximately 14 feet. These excavations are anticipated to impact Quaternary older (Pleistocene-aged) alluvium, which has a moderate potential to yield fossils, starting at depths of 5 to 7.5 feet below the surface, beneath a layer of artificial fill. Due to the potential for subsurface materials to contain previously unknown fossils, a Paleontological Resources Monitoring and Mitigation Plan (PRMMP), as outlined in mitigation measure GEO-1, would be required. With implementation of mitigation measure GEO-1, impacts to paleontological resources would be less than significant. ***Mitigation Measure*** **GEO-1.** Prior to the start of construction, a PRMMP shall be prepared. The PRMMP shall provide detailed recommended monitoring locations; a description of a worker training program; detailed procedures for monitoring, fossil recovery, laboratory analysis, and museum curation; and notification procedures in the event of a fossil discovery by a paleontological monitor or other project personnel. A curation agreement with the Natural History Museum of Los Angeles County or another accredited repository must be obtained. Any subsurface bones or potential fossils that are unearthed during construction shall be evaluated by a Qualified Paleontologist. Reference 20 (Paleontological Inventory Report).				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
8. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

Standard: A significant impact may occur if the project would generate substantial greenhouse gas emissions during construction or operation.

Explanation: The proposed Project would generate greenhouse gas (GHG) emissions from construction equipment and vehicular traffic. CalEEMod was used to prepare estimates of annual GHG emissions. Table 3 presents the estimated emissions of GHGs that would be released to the atmosphere on an annual basis. Construction of the proposed Project would produce approximately 798.2 metric tons of carbon dioxide equivalent ($MTCO_2e$), or 26.6 $MTCO_2e$ annually over a 30-year period. The total annual operating emissions would be approximately 96.4 $MTCO_2e$ per year after accounting for amortized construction emissions. This mass rate is substantially below the most applicable quantitative draft interim threshold of 3,000 $MTCO_2e$ per year as recommended by the SCAQMD. The pocket park and underground parking structure would maintain existing vehicle trips, thus mobile source emissions would remain unchanged from existing conditions. Therefore, implementation of the proposed Project would result in a less than significant impact related to GHG emissions. No mitigation measures would be required.

Table 3
Estimated Annual Greenhouse Gas Emissions

Scenario and Source	Annual GHG Emissions ($MTCO_2e$ per Year)
Construction Emissions Amortized (Direct)[a]	26.6
Area Source Emissions (Direct)	<0.1
Energy (Indirect)	65.4
Mobile	0.0
Waste Disposal Emissions (Indirect)	<0.1
Water Distribution Emissions (Indirect)	4.4
Total Emissions	**96.4**
SCAQMD Draft Interim Significance Threshold	**3,000**
Exceed Threshold?	No

[a] Based on SCAQMD guidance, the emissions summary also includes construction emissions amortized over a 30-year span.
Source: TAHA, 2018.

Reference 22 (Air Quality and Greenhouse Gas Emissions Impact Study).

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

Standard: A significant impact may occur if the project would conflict with adopted plans, policies, or regulations to reduce greenhouse gas emissions.

Explanation: The proposed Project would comply with plans, policies and regulations adopted for reducing emissions of GHGs including the Assembly Bill (AB) 32 Scoping Plan, which includes goals such as the expansion of energy efficiency and producing energy from renewable resources. The City of Los Angeles has published the GreenLA, An Action Plan to Lead the Nation in Fighting Global Warming (the LA Green Plan), where the City will increase renewable energy generation, improve energy conservation and efficiency. Senate Bill (SB) 375 requires the metropolitan planning organizations to prepare an Sustainable

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact

Communities Strategy (SCS) in their regional transportation plans to achieve the per capita GHG reduction targets, and the region's SCS is contained within SCAG's 2016–2040 RTP/SCS. The RTP/SCS focuses on job growth in high quality transit areas, resulting in more opportunity for transit-oriented development. The proposed Project would be located within walking distance of the Metro Purple Line Wilshire/Western Station; Metro local bus lines 20 and 720 along Wilshire Boulevard, Metro local bus line 207 and Los Angeles Department of Transportation (LADOT) DASH lines along Western Avenue. These public transit lines would serve the Koreatown neighborhood and surrounding communities. The proposed Project would be consistent with the mobility and transit accessibility objectives of the RTP/SCS.

Executive Order (E.O.) B-30-15 established an interim GHG reduction target of 40 percent below 1990 levels by 2030, and E.O. S-3-05 established a long-term goal of reducing statewide GHG emissions to 80 percent below 1990 levels by 2050. Achieving these long-term GHG reduction policies will require systemic changes in how energy is produced and used. There are a number of studies that discuss potential mechanisms for limiting statewide GHG emissions to meet the aggressive goals identified by E.O. B-30-15 and E.O. S-3-05. For example, the California Air Resource Board (CARB) and other State agencies commissioned Energy + Environmental Economics in 2015 to develop feasible GHG reduction scenarios for 2030. Other studies include a report by the California Center for Science and Technology, the California Department of Transportation's California Transportation Plan 2040, CARB's First Update to the AB 32 Scoping Plan, and a study published in Science that analyzes the changes that will be required to reduce GHG emissions to 80 percent below 1990 levels by 2050. In general, these studies reach similar conclusions, that deep reductions in GHG emissions can only be achieved with significant changes in electricity production, transportation fuels, and industrial processes (e.g., decarbonizing electricity production, electrifying transportation, utilizing alternative fuels for aviation).

The systemic changes that will be required to achieve EO B-30-15 and EO S-3-05, if they are legislatively adopted, will require significant policy, technical, and economic solutions. Some changes, such as the use of alternative fuels (e.g., biofuel) to replace petroleum for aviation, cannot be accomplished without action by the federal government. Similarly, achieving the reduction goals will require California to dramatically increase the amount of electricity that is generated by renewable generation sources and, correspondingly, advance the deployment of energy storage technology and smart-grid strategies, such as price-responsive demand and the smart charging of vehicles. This would entail a significant redesign of California's electricity system, which can only be accomplished through State action. Accordingly, in evaluating the Project's emissions for consistency with E.O. S-3-05 and E.O. B-30-15, it is important to note that many of the broad-scale shifts needed to meet the reduction goals are outside of the control of the City and beyond the scope of the proposed Project.

The long-term climate change policy and regulatory changes that will be enacted to meet 2030 and 2050 emissions reduction targets are unknown at this time. As a consequence, the extent to which the proposed Project emissions and resulting impacts would be mitigated through implementation of statewide (and nationwide) changes is not known. However, some of the anticipated statewide actions (e.g., decarbonization, energy efficiency, alternative transportation) can be facilitated, at least to some extent, through implementation of specific GHG reduction measures in large-scale developments. The proposed Project includes policies related to planting drought-tolerant species resulting in reduced water consumption. These policies follow California Assembly Bill 1881 Water Efficient Landscape Ordinance as well as the City of Los Angeles' Landscape Ordinance. The Project is consistent with anticipated long-term statewide strategies to reduce GHG emissions. Accordingly, the Project would not conflict with the goals in EO S-3-05 and EO B-30-15. Therefore, the proposed Project would not conflict with any plans, policies, or regulations to reduce GHGs, and impacts would be less than significant. Reference 22 (Air Quality and Greenhouse Gas Emissions Impact Study).

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
9. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project involved the use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions.				
Explanation: Construction activities would be temporary in nature and would involve the limited transport, storage, use, and disposal of hazardous materials. Such hazardous materials could include on-site fueling/servicing of construction equipment, and the transport of fuels, lubricating fluids, and solvents. These types of materials are not acutely hazardous, and all storage, handling, and disposal of these materials are regulated by the California Department of Toxic Substances Control, United States Environmental Protection Agency, the Occupational Safety & Health Administration, the City of Los Angeles Fire Department, and the Los Angeles County Department of Public Health. The transport, use, and disposal of construction-related hazardous materials would occur in accordance with applicable federal, State, and local regulations governing such activities. Asbestos-containing materials (ACMs) are materials that contain asbestos, a naturally-occurring fibrous mineral that was historically used in building materials for its thermal properties and tensile strength. When left intact and undisturbed, these materials do not pose a health risk to building occupants. There is, however, potential for exposure when ACMs become damaged to the extent that asbestos fibers become airborne and are in haled. These airborne fibers are carcinogenic and can cause lung disease. The age of a building is directly related to its potential for containing elevated levels of ACMs, and asbestos was used routinely in many building materials until 1978. As the Pio Pico-Koreatown Library building was constructed close to this timeframe in 1981, there is some potential that ACMs could be present. As such, there is potential for ACMs to be disturbed during the modifications to the existing windows and restrooms. If ACMs are discovered during this work, they would be abated in compliance with all applicable local, state, and federal regulations. Additionally, the Phase I Environmental Site Assessment prepared for the proposed Project did not identify and hazardous waste sites within 500 feet of the Project site that could contribute to the generation of hazardous emissions during construction. Therefore, with adherence to existing regulations, the short-term construction impact would be less than significant. Operation of the proposed Project may involve limited transport, use, or disposal of hazardous materials, such as oils, pesticides, or chemicals. Any chemicals or pesticides related to the maintenance of the proposed underground parking structure or landscaping throughout the pocket park would be stored in relatively small quantities in appropriate containers and handled in accordance with the manufacturer's instructions to protect the health and safety of the public and the environment. As such, the operational impacts would be less than significant.				
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?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project involved a risk of accidental explosion or utilized substantial amounts of hazardous materials as part of its routine operations that could potentially pose a hazard to the public under accident or upset conditions.				
Explanation: Construction may involve the transport, storage, use or disposal of some hazardous materials, such as on-site fueling/servicing of construction equipment. These types of materials are not acutely hazardous. All construction activities involving the transportation, usage, and disposal of hazardous				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
materials would be subject to federal, state, and local health and safety requirements. Such transport, use, storage and disposal would not create a significant hazard to workers or the community. Also, prior to construction, the project contractor would develop an emergency response plan, spill prevention plan, or similar plan. Project personnel would have available adequate spill containment and cleanup resources on site at all times and be prepared to contain, control, clean up, and dispose of any potential fuel spill quickly and completely. During construction, project personnel would follow all applicable rules and regulations governing the storage, transportation, use, handling, and disposal of hazardous materials. Methane gas is known to be generated in the area, and the Project site is located within a City-designated Methane Zone. Methane is generated by the biodegradation of organic matter in the absence of oxygen. Methane is not toxic; however, it is combustible and potentially explosive at concentrations above 53,000 parts per million in the presence of oxygen. Non-pressurized methane is not normally problematic if properly monitored and controlled per California Occupational Safety and Health Administration regulations. If the gas accumulates to high concentrations and becomes pressurized, detectable levels may enter the interior of a structure through cracks or other penetrations present in floor slabs. Development of structures within a Methane Zone is governed by Division 71 of the LAMC, which mandates the implementation of various elements such as methane detection systems, proper ventilation, etc. A Methane Soil Gas Investigation was conducted to measure methane concentrations at the Project site. The Methane Soil Gas Investigation indicated that methane concentrations at the site were below detectable levels and recommended that the Project implement a methane system to meet design requirements for Methane Zone Level II, including a passive sub-slab vent system with an impervious membrane, perforated collection pipes, 2-inch gravel blanket surrounding the pipes, and vent risers. The proposed Project would be required to be designed and constructed to comply with the regulations of Division 71 of the LAMC and the recommendations in the Methane Soil Gas Investigation prepared for the proposed Project. Additionally, all excavation work would be conducted in accordance with the California Occupational Health and Safety Administration regulations, which require monitoring before and during construction, as well as BOE Standard Specifications to document tested methane levels and provide those levels to construction contractors working at the site. Adherence to these existing regulations and recommendations in the Methane Soil Gas Investigation Report would ensure that impacts related to on-site methane seepage in structures would be less than significant. References: 11 (LAMC), 21 (Methane Soil Gas Investigation).				
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project were located within one-quarter mile of an existing or proposed school site and were projected to release toxic emissions which pose a hazard beyond regulatory thresholds.				
Explanation: One school, Camino Nuevo Charter Academy, is located within one-quarter mile of the Project site. Proposed project construction would involve the handling of hazardous materials (fuels, lubricants, and oils). However, construction activities are temporary in nature and the handling of minor amounts of hazardous materials would be in compliance with applicable regulations. Additionally, as discussed, the proposed Project would not pose a substantial risk involving the routine transport, use, and disposal of hazardous materials. Furthermore, operation of the proposed project would not generate industrial wastes or toxic substances. Therefore, the potential impact associated with the emission of hazardous materials near an existing or proposed school would be less than significant.				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to *California Government Code* Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
Standard: *California Government Code* Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste and submit such information to the state Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if the project site is included on any of the above referenced lists and, therefore, would pose an environmental hazard to surrounding sensitive uses.				
Explanation: A Phase I Environmental Site Assessment was prepared for the proposed Project, which included a review of hazardous materials sites databases. The Project site was only identified in the site-specific environmental database report as City of Los Angeles Department of Public Works at 694 South Oxford Avenue in the CA HAZNET (Facility and Manifest Data) database. The data in the HAZNET database is extracted from the copies of hazardous waste manifests received each year by the California Department of Toxic Substances Control since 1993. The HAZNET database reports that the City of Los Angeles Department of Public Works generated "other inorganic solid waste" in 2001 that was manifested for offsite disposal and/or recycling via a transfer station. The database listing is compliance-related and not indicative of a release at the Project site. As such, this listing is not considered to represent a Recognized Environmental Condition to the Project site. Therefore, the Project site's listing on an environmental database would not create a significant hazard to the public or the environment. The impact would be less than significant. Reference: 4 (Phase I ESA).				
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project site were located within a public airport land use plan area, or within two miles of a public airport, and would create a safety hazard or excessive noise.				
Explanation: The Project site is not located within a public airport land use plan area, or within two miles of a public airport, and would not create a safety hazard or excessive noise. No impact would occur. Reference: 1 (AirNav).				
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project were to substantially interfere with roadway operations used in conjunction with an emergency response plan or evacuation plan or would generate sufficient traffic to create traffic congestion that would interfere with the execution of such plan.				
Explanation: During construction activities, vehicles and equipment would access the site via the existing driveway located on Oxford Avenue. Partial street closures along Serrano Avenue and 7th Street would be required for approximately 8 to 14 months. However, ingress and egress to the site and surrounding properties, particularly for emergency response vehicles, would be maintained at all times during construction. Additionally, as listed in the Construction BMPs in Section II.E., Construction Schedule and Procedures, above, BOE would coordinate with all applicable agencies regarding construction schedules and worksite traffic control and detour plans, including LAPD and LAFD. Following construction, operation would not permanently alter the adjacent street system. The existing roadway widths would accommodate the conversion of the on-street parallel parking spaces along Serrano Avenue and 7th Street to angled spaces. Therefore, construction and operation of the proposed Project would not impair or interfere with implementation of an adopted emergency response plan or emergency evacuation plan. The impact would				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
be less than significant.				
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project were located in a wild land area and poses a significant fire hazard, which could affect persons or structures in the area in the event of a fire.				
Explanation: The Project site is not located within a designated High Fire Hazard Severity Zone according to the City of Los Angeles General Plan. The Project site and surrounding areas are completely developed and there are no wildlands adjacent to the site. Therefore, no impact related to wildland fires would occur. Reference: 14 (ZIMAS).				
10. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project discharged water which did not meet the quality standards of agencies which regulate surface water quality and water discharge into storm-water drainage systems, or included potential sources of water pollutants with the potential to substantially degrade water quality.				
Explanation: Construction activities have the potential to degrade water quality through the exposure of surface runoff to exposed soils, dust, and other debris, as well as from runoff from construction equipment. Other than the sources described for construction activities, the proposed Project does not include other potential sources of contaminants that could potentially degrade water quality. As discussed in Section II.E, Construction Schedule and Procedures, above, the proposed Project would implement construction erosion BMPs, which may include temporary desilting basins; silt fences; gravel bag barriers; temporary soil stabilization with mattresses and mulching; temporary drainage inlet protection; and diversion dikes and interceptor swales. With implementation of construction BMPs, construction activities would not violate water quality standards or waste discharge requirements. The impact would be less than significant during construction. The Project site is currently developed with paved surface parking lot and is primarily covered with impermeable surfaces. With implementation of the proposed Project, the permeable surfaces at the Project site would be increased with the addition of landscaped areas. As such, storm water flows from the Project site would be reduced during operation of the proposed Project. Additionally, any runoff leaving the Project site would continue to drain to the existing storm drain inlets in the surrounding area. Wastewater generated by the proposed Project during operation would be collected and transported through existing local, trunk, and mainline sewers. Therefore, impacts to water quality during operation of the proposed Project would be less than significant.				
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
Standard: A project would normally have a significant impact on groundwater supplies if it were to result in a demonstrable and sustained reduction of groundwater recharge capacity or change the potable water levels sufficiently that it would reduce the ability of a water utility to use the groundwater basin for public water supplies or storage of imported water, reduce the yields of adjacent wells or well fields, or adversely change the rate or direction of groundwater flow.				
Explanation: Excavations up to 14 feet would be required for construction of the proposed Project. However, it is not anticipated that groundwater would be encountered, as deep excavations would not be				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
necessary. Additionally, the proposed Project does not involve any direct extraction of groundwater. The proposed Project is currently developed with a paved surface parking lot. The proposed Project would neither decrease the amount of storm water entering the groundwater table through an increase in the amount of impermeable surfaces, nor interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The impact to groundwater supply and recharge would be less than significant. Reference: 18 (Geotechnical Investigation Report).				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project resulted in a substantial alteration of drainage patterns that resulted in a substantial increase in erosion or siltation during construction or operation of the project.				
Explanation: No streams or rivers cross the Project site. The Project site and surrounding area is completely developed and would not be susceptible to erosion from uncontrolled runoff. The Project site is completely flat and excavation within the Project site would not alter existing drainage patterns. Any stormwater conveyed from the site would drain into existing storm drains that serve the site. As discussed in item 10(a) above, implementation of the proposed Project would result in an increase in the amount of permeable surfaces at the Project site. However, an increase in permeable surfaces during operation would serve to reduce the amount and rate of runoff from the Project site. As such, the proposed Project would not result in a substantial increase in erosion or siltation on- or off-site. The impact would be less than significant.				
ii) substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project resulted in increased runoff volumes during construction or operation of the proposed project that would result in flooding conditions affecting the project site or nearby properties.				
Explanation: Refer to items 10(a) and 10(c)(i) above. The proposed Project would not result flooding on- or off-site. The impact would be less than significant.				
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?	☐	☐	☒	☐
Standard: A significant impact may occur if the volume of runoff were to increase to a level which exceeded the capacity of the storm drain system serving a project site. A significant impact may also occur if the proposed project would substantially increase the probability that polluted runoff would reach the storm drain system.				
Explanation: Refer to item 10(a) and 10(c)(i) above. The proposed Project would result in a reduction in the amount and rate of runoff from the Project site by increasing the amount of permeable surfaces at the Project site. The impact would be less than significant.				
iv) impede or redirect flood flows?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project would impede or redirect flood flows, causing flooding elsewhere.				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Explanation: Refer to item 10(a) and 10(c)(i) above. The proposed Project would result in a reduction in the amount and rate of runoff from the Project site by increasing the amount of permeable surfaces at the Project site. The impact would be less than significant.				
d) In a flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project were located in a flood hazard, tsunami, or seiche zones, and may release pollutants due to project inundation.				
Explanation: As discussed in item (c)(iv), the Project site is not located within a 100-year flood hazard area. In addition, the Project site is not located in proximity to the ocean or a closed body of water (e.g., lake or reservoir) and would not be subject to hazards associated with tsunami or inundation from a seiche. Therefore, no impact related to risk release of pollutants due to project inundation would occur.				
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project were inconsistent with a water quality control plan or sustainable groundwater management plan, designated to avoid or mitigate a significant potential environmental impact.				
Explanation: As discussed in item 10(a), the proposed Project would implement construction erosion BMPs, and would not violate water quality standards. Per the Geotechnical Investigation Report prepared for the proposed Project, dewatering is not anticipated during construction. Nonetheless, should groundwater be encountered during excavation activities, appropriate permits would be obtained, and any release of this water would be done in accordance with all applicable regulations. With implementation of the proposed Project, the permeable surfaces at the Project site would be increased with the addition of landscaped areas. During operation, any runoff leaving the Project site would continue to drain to the existing storm drain inlets in the surrounding area. Wastewater generated by the proposed Project during operation would be collected and transported through existing local, trunk, and mainline sewers. As such, the proposed Project would not conflict with or obstruct implementation of a water quality control plan. As discussed in item 10(b), the proposed Project would not decrease the amount of storm water entering the groundwater table through an increase in the amount of impermeable surfaces, or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The impact would be less than significant.				
11. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project were sufficiently large or otherwise configured in such a way as to create a physical barrier within an established community.				
Explanation: Neither construction nor operation of the proposed Project would include features such as a highway, above-ground infrastructure, or an easement that would cause a permanent disruption to an established community or would otherwise create a physical barrier within the established community. No streets or sidewalks would be permanently closed as a result of the proposed Project, and no separation of existing uses or disruption of existing access between land use types would occur. Therefore, the proposed Project would not physically divide an established community, and no impact would occur.				
b) Cause a significant environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Standard: A significant impact may occur if the proposed project were inconsistent with the General Plan, or other applicable plan, or with the site's zoning if designated to avoid or mitigate a significant potential environmental impact.				
Explanation: The Project site is located within the Wilshire Community Plan Area of the City of Los Angeles and implementation of the proposed Project would be subject to the development regulations outlined in the Community Plan and the LAMC. The Project site is designated for commercial uses in the Community Plan. Additionally, as previously discussed, the majority of the Project site is zoned CR for limited commercial uses, while the southernmost strip of the Project site is zoned P for automobile parking. The CR Zone allows for parks and playgrounds owned and operated by a governmental agency and public parking areas. The P Zone allows for public or private parking area and parking buildings which are located entirely below the natural or finished grade of the lot and are designed to be obscured from view. The proposed Project involves the development of a pocket park, which would be operated by LARAP, and an underground parking structure, which would provide public parking spaces on the site of the existing surface parking lot. Both of these proposed uses are allowed by the existing zoning and land use designations governing development at the Project site under the Community Plan and the LAMC. Additionally, the proposed Project would be consistent with following policies and programs outlined in the Wilshire Community Plan: • Policy 4-4.1: Develop new neighborhood and community parks to help offset the Wilshire Community's parkland deficit: o Program: Facilitate the creation of small neighborhood serving pocket parks within highly urbanized areas as potential parcels and funding become available. o Program: Implement the Wilshire Community Plan recommendations for new Pocket Parks and Neighborhood Park expansions along all Boulevards, within public right-of-ways, and on unused and underutilized public properties, particularly as expansions of existing facilities, as land and funding become available, and if compatible with uses as transportation corridors, where applicable. • Policy 5-1.3: Convert and upgrade underutilized publicly-owned property. • Policy 5-1.4: Unused or underutilized public lands should be considered for open space and recreational purposes The proposed Project would not cause a significant environmental impact due to conflict with any applicable land use plan, policy or regulation. Therefore, no impact would occur. Reference: 13 (General Plan), 14 (ZIMAS).				
12. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
Standard: A significant impact may occur if the project were located in an area used or available for extraction of a regionally important mineral resource, if the project converted an existing or potential present or future regionally-important mineral extraction use to another use, or if a project affected access to such a site.				
Explanation: No mineral resources have been identified within the Project Site. The nearest well is located approximately 400 feet southwest of the Project site and is identified as plugged and abandoned. Additionally, the Project site is not located in an oil field or oil drilling area as designated by the City. The				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
proposed Project would not result in the permanent loss of or access to any significant mineral resources, and no impact would occur. Reference: 8 (California Department of Conservation, Division of Oil, Gas & Geothermal Resources), 13 (General Plan).				
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒
Standard: A significant impact may occur if a project were located in an area used or available for extraction of a locally-important mineral resource and the project converted such a resource to another use or affected access to such a site.				
Explanation: Refer to item 12(a) above. No impact would occur.				
13. NOISE – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
Standard: A significant impact may occur if the project generated noise levels during construction or operation exceeding the standards for ambient noise as established by the General Plan and Municipal Code.				
Explanation: Sound is technically described in terms of the loudness (amplitude) and frequency (pitch).[6] The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The A-weighted scale, abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. This noise analysis discusses average sound levels in terms of Equivalent Noise Level (L_{eq}) and the Community Noise Equivalent Level (CNEL). Leq is the average sound level for any specific time period, on an energy basis. The Leq for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound. Leq can be thought of as the level of a continuous noise which has the same energy content as the fluctuating noise level. Leq is expressed in units of dBA. CNEL is an average sound level during a 24-hour period. CNEL is a noise measurement scale, which accounts for noise source, distance, single event duration, single event occurrence, frequency, and time of day. **Construction** *Equipment* Construction activity is anticipated to begin in May <u>2020</u> ~~2019~~ and take approximately 18 months to complete. It is estimated that approximately 30 to 50 construction personnel would be on-site per day. LAMC allows construction activity to occur Monday through Friday between the hours of 7:00 a.m. and 9:00 p.m. and the hours of 8:00 a.m. and 6:00 p.m. on Saturdays. Construction activity is prohibited on Sundays and federal holidays. Construction activity would occur Monday through Friday from 7:00 a.m. to 4:00 p.m. and would not occur outside of the allowed hours. Typical noise levels from various types of equipment that may be used during construction are listed in Table 4, which shows noise levels at distances of 50 feet from the construction noise source. Construction activities typically require the use of numerous pieces of noise-generating equipment. The noise levels shown in Table 5 take into account that multiple pieces of construction equipment would be operating				

6 California Department of Transportation, *Technical Noise Supplement*, November 2009.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact

simultaneously. When considered as an entire process with multiple pieces of equipment, Project-related activity (i.e., ground clearing and site preparation) would generate noise levels between 84 and 89 dBA L_{eq} at 50 feet.

Table 4
Noise Level Ranges of Typical Construction Equipment

Construction Equipment	Noise Level at 50 feet (L_{eq}, dBA)
Compactor (ground)	76.2
Concrete Mixer Truck	74.8
Concrete Saw	82.6
Crane	72.6
Dozer	77.7
Dump Truck	72.5
Excavator	76.7
Front End Loader	75.1
Grader	81.0
Pickup Truck	71.0
Pumps	77.9
Vacuum Street Sweeper	71.6
Vibratory Concrete Mixer	73.0

Source: Federal Highway Administration, *Roadway Construction Noise Model, Software Version 1.*1, 2008.

Table 5
Typical Outdoor Construction Noise Levels

Construction Method	Noise Level at 50 feet (dBA, L_{eq})
Ground Clearing	84
Site Preparation	89
Foundations	78
Structural	85
Finishing	89

Source: USEPA, *Noise From Construction Equipment And Operations, Building Equipment And Home Appliances*, PB 206717, 1971.

Construction noise has been assessed at sensitive receptors near the Project site. Table 6 presents construction noise levels at sensitive receptors near the Project site based on a combined equipment noise level of 89 dBA at 50 feet. The impact analysis is based on the construction limits in the LAMC. Construction activity would comply with the allowable hours of construction in the LAMC, including 7:00 a.m. to 9:00 p.m. Monday through Friday, 8:00 a.m. to 6:00 p.m. on Saturday, and no construction activity on Sundays or federal holidays. The LAMC limits equipment noise levels to 75 dBA at 50 feet unless technically infeasible. Noise levels from individual pieces of equipment would typically range from 71.0 to 82.6 dBA L_{eq} at 50 feet. Unmitigated noise levels would typically exceed the allowable noise level stated in the LAMC. Therefore, mitigation measures NOI-1 through NOI-8 would be required to ensure that impacts related to construction noise would be less than significant.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact

Table 6
Maximum Construction Noise Levels at Receptors - Unmitigated

Sensitive Receptor	Distance (feet)[a]	Maximum Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient at Receptor (dBA, L_{eq})
Pio Pico Koreatown Branch Library to the east	10	103.0	57.0	103.0
Educational Uses to the north	50	89.0	56.1	89.0
Residences to the south	80	84.9	63.0	84.9
Radio Korea to the north /a/	110	82.2	56.1	82.2
Residences to the southwest	130	80.7	63.0	80.8
Solid State Logic to the north /a/	155	79.2	56.1	79.2
Residences to the southeast	260	74.7	60.3	74.8

a. Distance is the sloped distance from the location of the suite to ground level at project site.
Source: TAHA, 2018.

Trucks

In addition to on-site construction activities, noise would be generated off-site by construction-related trucks. The proposed Project would require the export of 10,000 cubic yards of contaminated soil and the import of 1,000 cubic yards of clean soil. Approximately 20 haul truck trips per day would occur for the duration of the import and export phases. A doubling of traffic volume is typically needed to audibly increase noise levels along a roadway segment. An additional 20 trucks per day would not double the volume on any roadway segment. It is not anticipated that off-site vehicle activity would audibly change average daily noise levels due to the low volume of haul truck trips per day. Therefore, the proposed Project would result in a less than significant impact related to construction-related off-site noise.

Operation

Typical sources of noise for new projects include increased traffic, mechanical equipment, and parking lots. The proposed pocket park would include elements such as a multi-purpose event area to accommodate public events, such as performances, fairs, readings, etc.; a playground for small children; a shade structure; a fitness area; a walking loop; and benches and tables. The noise level at the center of the existing parking lot was measured at 57.0 dBA L_{eq}, with six car movements. However, the dominant noise source was existing traffic noise, and parking lot car movements was not a significant contributor to the existing noise environment. The proposed Project is anticipated to be used by the existing local community and users of the Pio Pico Koreatown Branch Library, and would not generate new vehicle trips. Noise generating activities associated with the park, particularly the multi-purpose event area are not anticipated to be audible above existing traffic noise within the Project vicinity. Furthermore, noise generating park activity would be regulated by LAMC Section 112.01, LAMC Section 115.02, and LAMC Section 116.01, which would be enforced through the Los Angeles Police Department.

The proposed Project also involves the replacement of the existing surface parking lot with an underground parking structure. Vehicular access to the underground parking structure would be provided via the existing driveway location on Oxford Avenue. The number of parking spaces and vehicular access would be similar to existing conditions and no change to parking noise is expected to result. The increase in noise from this underground parking structure would be less than 1 dBA CNEL and would not be audible at any sensitive receptor. Therefore, the proposed Project would result in a less than significant impact related to operational noise and no mitigation measures are required.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact

Mitigation Measures:

NOI-1 Construction equipment shall be properly maintained and equipped with mufflers.

NOI-2 Grading and construction contractors shall use rubber-tired equipment rather than metal-tracked equipment.

NOI-3 Equipment shall be turned off when not in use for an excess of five minutes, except for equipment that requires idling to maintain performance.

NOI-4 The public shall be notified in advance of the location and dates of construction hours and activities.

NOI-5 Construction activities shall be prohibited between the hours of 9:00 p.m. and 7:00 a.m. when located within 500 feet of occupied sleeping quarters or other land uses sensitive to increased nighttime noise levels.

NOI-6 A Noise Disturbance Coordinator shall be established. The Noise Disturbance Coordinator shall be responsible for responding to local complaints about construction noise. The Noise Disturbance Coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the Noise Disturbance Coordinator.

NOI-7 The Noise Disturbance Coordinator shall coordinate with the site administrator of the Pio Pico Koreatown Branch Library, Radio Korea, and Solid State Logic recording studio to avoid disruptions to normal operations.

NOI-8 Barriers, such as, but not limited to, plywood structures or flexible sound control curtains extending eight feet in height shall be erected around the Project site or noise activity to minimize the amount of noise during construction on the nearby noise-sensitive uses located within the library or offsite. These barriers shall be capable of reducing noise levels by at least 10 decibels. Also, for internal modifications to the library restroom facilities, noise will be controlled in a similar manner or work will be performed during non-operational hours, so that library patrons and other sensitive receptors are not impacted.

Mitigation measures NOI-1 through NOI-8 are designed to reduce construction noise levels. The equipment mufflers associated with mitigation measure NOI-1 would reduce construction noise levels by approximately 3 dBA and the mitigation measure NOI-8 would reduce noise levels by approximately 10 dBA. Mitigation measures NOI-2 through NOI-7, although difficult to quantify, would also reduce and/or control construction noise levels. Other measures that were considered included the following:

- Electric Equipment - Electric equipment would generate less noise than diesel equipment but is not widely available and the horsepower associated with electric equipment would not meet project requirements.
- Relocation - Removing the affected land uses from the construction zone would eliminate the impact. This measure would not be feasible due to the associated cost of relocation.
- Window Retrofits - Retrofitting windows at affected land uses would reduce noise exposure. This measure would not be feasible due to the number of affected land uses and associated cost of retrofitting considering the temporary nature of the noise from construction.

It should be noted that exterior construction noise levels would be reduced by the exterior walls and windows of the closest sensitive receptor, which is the adjacent Pio Pico Koreatown Library. According to the Caltrans Technical Noise Supplement, a standard masonry building with double-glazed windows would result in an exterior to interior noise reduction of 30 dB. Therefore, the interior noise level of the library

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact

would be reduced from 90 dB to approximately 60 dB during the loudest construction period. The interior noise level would be greatest at rooms adjacent to construction activity. As the sound waves travel further into the building additional noise attenuation related to distance and related to absorptive surfaces such as carpeting would occur. Noise levels would be reduced at areas within the library located away from construction activity. It is assumed that the library includes more substantial insulation than a standard building and the interior noise level during construction would likely be even lower. It is also assumed that these same exterior wall attenuation factors would also serve to reduce noises internal to buildings at the remainder of the sensitive receptors. Additionally, the LAMC time restrictions on construction noise apply to outdoor construction activities. The minor modifications to the existing restrooms would be completed within the library building and could be completed during hours that the library is not open to the public, as outlined in mitigation measure NOI-8, to further reduce impacts to library patrons.

Mitigation measures NOI-1 through NOI-8 are feasible measures to control noise levels, including engine mufflers. Mitigated noise levels at sensitive receptors are shown in Table 7. Mitigated noise levels at sensitive receptors would be between 64.1 dBA L_{eq} and 90.0 dBA L_{eq}. With implementation of these feasible mitigation measures, and based on compliance with the LAMC, construction equipment noise would be mitigated to the greatest extent feasible. Therefore, with implementation of mitigation measures NOI-1 through NOI-8, the proposed Project would result in a less than significant impact related to construction noise.

Table 7
Typical Construction Noise Levels at Receptors - Mitigated

Sensitive Receptor	Distance (feet)[a]	Attenuation[b,c]	Maximum Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient at Receptor
Pio Pico Koreatown Branch Library to the east	10	13	90.0	57.0	90.0
Educational Uses to the north	50	13	76.0	56.1	76.0
Residences to the south	80	13	71.9	63.0	72.4
Radio Korea to the north	110	3	79.2	56.1	79.2
Residences to the southwest	130	13	67.7	63.0	69.0
Solid State Logic to the north	155	3	76.2	56.1	76.2
Residences to the southeast	260	13	61.7	60.3	64.1

a. Distance is the sloped distance from the location of the suite to ground level at project site.
b. Includes 3 dBA reductions for mufflers.
c. Includes 10 dBA reductions for soundwalls.

Source: TAHA, 2018.

Reference: 23 (Noise and Vibration Impact Study).

b) Generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☒	☐

Standard: A significant impact may occur if the project were to generate excessive ground-borne vibration or ground-borne noise levels.

Explanation:

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

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact

vibration.

Construction

Construction activity can generate varying degrees of vibration, depending on the procedure and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of a construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, and to slight damage at the highest levels. In most cases, the primary concern regarding construction vibration relates to damage.

On-Site Equipment

The Federal Transit Administration (FTA) provides vibration levels for various types of construction equipment with an average source level reported in terms of velocity. Table 8 provides estimates of vibration levels for a wide range of soil conditions. The reference levels were used to estimate vibration levels at the sensitive receptors most likely to be impacted by equipment. Vibration levels are shown in Table 9.

Table 8
Vibration Velocities for Construction Equipment

Equipment	PPV at 25 feet (inches/second)	Approximate L_v at 25 feet[a]
Large Bulldozer	0.089	87
Loaded Trucks	0.076	86
Small Bulldozer	0.003	58

Note: Lv= vibration level
[a.] RMS velocity in decibels (VdB) related to 1 micro-inch/second.
Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

Table 9
Estimated Vibration Levels

Sensitive Receptor	Distance from Large Bulldozer Activity (feet)	Vibration Level (inches/second)[a]
Radio Korea to the north	50	0.031
Solid State Logic to the north	50	0.031
Educational Uses to the north	50	0.031
Residences to the south	80	0.016
Residences to the southwest	130	0.008
Residences to the southeast	260	0.003

[a.] Engineered concrete and masonry (no plaster) building damage impact criterion is 0.3 inches per second.
Source: TAHA, 2018.

The maximum vibration levels would be generated during large bulldozer activity. Vibration levels would be approximately 0.089 inches per second and 87 VdB at 25 feet. The primary concern for vibration during construction is the potential for damage to nearby structures. Typical structures within the City of Los Angeles are engineered concrete and masonry buildings which are held to a vibration damage threshold of 0.3 inches per second. The nearest off-site structure would be approximately 50 feet adjacent to the north. Large bulldozer vibration levels would be 0.031 inches per second, which would be well below the 0.3

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact

inches per second damage threshold. As such, no other structures would experience vibration levels that would exceed the threshold. Therefore, construction activity would result in a less than significant impact related to vibration damage.

Vibration annoyance is another concern related to construction activity. However, perceptible vibration is not typically a concern for human health and is a common occurrence within the urban environment. Nonetheless, special uses such as Radio Korea and Solid State Logic recording studio adjacent to the northern boundary of the Project site may be impacted by vibration generated by construction equipment. Radio Korea is located on the 6th floor of the building and Solid State Logic is located on the 7th floor of the building. Per FTA guidance each of the uses has received additional attenuation for each floor above grade and the building foundation. As shown in Table 8, the FTA has established a 65 VdB threshold for vibration impacts where vibration may disrupt the operations of special uses, in this case a radio station and recording studio. Vibration levels were calculated for the two identified special status uses, Radio Korea and Solid State Logic recording studio, taking into consideration the distance of each suite from construction activity and the floor of the building on which each use was located. As shown in Table 10, Radio Korea would be located within 70 feet of heavy equipment activity and would experience a vibration level of approximately 50 VdB; Solid State Logic would be located within 120 feet of equipment activity and would experience a vibration level of approximately 42 VdB. Equipment activity would not exceed the FTA's 65 VdB threshold at either of the special status uses. Therefore, construction activity would result in a less than significant impact related to vibration annoyance.

Table 10
Estimated Vibration Annoyance Levels at Special Status Buildings

Sensitive Receptor	Distance from Large Bulldozer Activity (feet)[a]	Vibration Levels (VdB)[b]
Radio Korea to the north[c, d]	70	50
Solid State Logic	120	42

a. Distance is the distance of the suite from bulldozer activity and not the building distance.
b. Vibration annoyance impact criterion for special status building is 65 VdB.
c. A floor to floor attenuation factor of -2 dB is applied for floors 1 to 5 and -1 dB for floors 6-10.
d. An attenuation factor of -13 dB is applied for the construction of the building, large masonry on piles.

Source: TAHA, 2018.

Library patrons may intermittently experience perceptible vibration during the heaviest construction periods involving equipment. However, the library is not considered a sensitive receptor as the proposed Project is an improvement to the library property.

Off-Site Trucks

In addition to on-site construction activities, construction trucks on the roadway network have the potential to expose vibration-sensitive land uses located near the proposed project access route. It is anticipated that haul trucks would travel to the Project site using I-10, then travel north on Western Avenue to 7th Street, then east on 7th Street to Oxford Avenue. As shown in Table 8, loaded trucks generate vibration levels of 0.076 inches per second at a distance of 25 feet. Rubber-tired vehicles, including trucks, do not generate significant roadway vibrations that can cause building damage. It is possible that trucks would generate perceptible vibration at sensitive receptors adjacent to the roadway. However, these would be transient and instantaneous events typical to the roadway network. This level of activity is not considered substantial enough to generate a vibration annoyance. Therefore, construction truck activity would result in a less than significant impact related to vibration.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Operation The primary sources of proposed Project operational-related vibration would include vehicles traveling to the Project site for events and recreational activities. Vehicular movements would generate similar vibration levels as existing traffic conditions. The proposed Project would not introduce any significant stationary sources of vibration, including mechanical equipment that would be perceptible at sensitive receptors. Therefore, operational activity would result in a less than significant impact related to vibration. Reference: 17 (Federal Transit Administration), 23 (Noise and Vibration Impact Study).				
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
Standard: A significant impact may occur if the project site were located within two miles of an airport.				
Explanation: Refer to item 9(e) above. The Project site is not located within two miles of a public airport or private airstrip. The closest airport is Santa Monica Airport, located approximately 8 miles west of the Project site. No impact would occur. Reference: 1 (AirNav), 23 (Noise and Vibration Impact Study).				
14. POPULATION AND HOUSING – Would the project:				
a) Induce unplanned substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
Standard: A significant impact may occur if population growth is induced in an area, either directly or indirectly, such that the population of the area may exceed the planned population of that area.				
Explanation: The proposed Project involves the development of a pocket park and underground parking structure on the site of an existing surface parking lot. The proposed Project would serve the existing community and visitors of the Project site, and would not induce population growth. No impact would occur.				
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
Standard: A significant impact may occur if the project would result in a net loss of 15 single-family dwellings or 25 dwellings in multi-family housing.				
Explanation: No housing currently exists on the Project site and the proposed Project would not displace any people or housing. No impact would occur.				
15. PUBLIC SERVICES –				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	☐	☐	☒	☐

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Standard: A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve the proposed project based on response time, access, or fire hydrant/water availability.				
Explanation: Fire protection services in the City are provided by the City of Los Angeles Fire Department. The Project site is served by Fire Station 29, located approximately 0.5-mile northwest of the Project site at 4029 Wilshire Boulevard. As previously discussed, the proposed Project would serve the existing community. The proposed Project would not result in an increase in population, and thus, would not generate a need for new or altered fire protection facilities. The proposed Project would be constructed in accordance with all applicable fire codes set forth by the State Fire Marshall and Los Angeles Fire Department. Therefore, the proposed Project would not be considered a fire hazard and would not exceed the capacity of the Los Angeles Fire Department to serve the site or other areas with existing fire protection services. The nearest local fire responders would be notified, as appropriate, of the construction schedule so as to coordinate emergency response routing during construction work. The impact would be less than significant.				
ii) Police protection?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project were to result in an increase in demand for police services that would exceed the capacity of the police department responsible for serving the site.				
Explanation: The City of Los Angeles Police Department is the local law enforcement agency responsible for providing police protection services in the City. The Project site is served by the Olympic Community Police Station, located at 1130 Vermont Avenue. As previously discussed, the proposed Project would serve the existing community and would not generate population growth. Therefore, construction and operation of the proposed Project would not require the construction or expansion of police facilities. The local police station would be notified, as appropriate, of the construction schedule so as to coordinate emergency response routing during construction work. The impact would be less than significant.				
iii) Schools?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project includes substantial employment or population growth that could generate demand for school facilities that exceeded the capacity of the school district responsible for serving the project site.				
Explanation: As the proposed Project does not include development of any residential uses, no increase in residential population would occur. Additionally, as the proposed Project would serve existing customers, no housing or employment opportunities would be provided by the proposed Project. Therefore, no indirect population growth would occur. No new students would be generated, and no increase in demand for local schools would result. No impact to schools would occur.				
iv) Parks?	☐	☐	☐	☒
Standard: A significant impact may occur if the recreation and park services available could not accommodate the population increase resulting from the implementation of the proposed project.				
Explanation: As stated previously, the proposed Project does not include development of any residential uses and would not generate any new permanent residents that would increase the demand for local and regional park facilities. Additionally, the proposed Project would include a new pocket park at the Project site to serve the existing community. Therefore, no impact to parks would occur.				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
v) Other public facilities?	☐	☐	☐	☒
Standard: Projects that do not result in a net increase of 75 residential units normally would not have a significant impact on public libraries.				
Explanation: Construction and operation of the proposed Project would not induce growth, either directly or indirectly, and, therefore, would not increase the demand for or use of libraries or other public facilities in the area. Therefore, no impact to other public facilities would occur.				
16. RECREATION –				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project includes substantial employment or population growth that may generate demand for public park facilities that exceed the capacity of existing parks.				
Explanation: The proposed Project would implement a new pocket park at the Project site to serve the existing community. As previously discussed, the overall purpose of the proposed Project is to provide a public open green park space for the Koreatown neighborhood, which is currently lacking in parkland. Additionally, the proposed Project would not induce growth, either directly or indirectly, and, therefore, would not increase the demand for parks or other recreational facilities in the area. No impact would occur.				
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?	☐	☐	☒	☐
Standard: A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment.				
Explanation: The proposed Project would include the construction and operation of a new pocket park in an area that is currently lacking parkland. The potential physical effects on the environment resulting from development of the proposed recreational facility are analyzed throughout this document. No other adverse physical effects would occur, and the impact would be less than significant.				
17. TRANSPORTATION – Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project conflicts with a program, plan, ordinance, or policy that addresses the circulation system, including the capacity of the street system and those in support of alternative transportation.				
Explanation: The proposed underground parking structure would replace the existing surface parking lot and the proposed pocket park is intended to serve the existing community surrounding the Project site. As such, operation of the proposed Project is not anticipated to generate substantial levels of additional daily traffic. Therefore, the focus of the traffic analysis is on the construction period of the proposed Project. Study intersections were analyzed for potential impacts due to construction-related traffic.				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact

The study area applied to the proposed Project includes four study intersections within the local area, incorporating routes between the site and the local neighborhood, and both the Wilshire Boulevard and Western Avenue arterial corridors. Traffic counts were conducted to reflect existing traffic conditions at the following intersections:

1. Oxford Avenue & Wilshire Boulevard
2. Serrano Avenue & Wilshire Boulevard
3. Western Avenue & 7th Street
4. Oxford Avenue & 7th Street

Study intersections 1 through 3 are signalized intersections, while study intersection 4 is an unsignalized (4-way stop controlled) intersection.

For signalized study intersections, the LADOT has established specific thresholds for project related increases in the volume-to-capacity (V/C) ratio. Table 11 shows the increase in peak hour V/C ratios that would result in significant impacts.

LADOT does not require the analysis of unsignalized intersections and does not provide significance thresholds for unsignalized intersections but does suggest that overall delay be measured at these intersections. Thus, for the purposes of this analysis, the threshold of significance for Project-related traffic impacts at the unsignalized study intersections is the causing of a level of service (LOS) E or F condition (i.e., at capacity or over capacity) during construction.

Table 11
Significant Traffic Impact Thresholds for Signalized Intersections

Level of Service	Final V/C*	LADOT Significance: Project Related V/C increase
C	< 0.70 – 0.80	Equal to or greater than 0.040
D	< 0.80 – 0.90	Equal to or greater than 0.020
E and F	0.90 or more	Equal to or greater than 0.010

Note: Final V/C is the V/C ratio at an intersection, considering impacts from the project, ambient growth, trips from area/cumulative projects, but without proposed Project traffic impact mitigations.

Construction Trip Generation

Construction of the proposed Project is anticipated to begin in May 2020 and take approximately 18 months to complete, concluding in November 2021. It is anticipated based on current Project construction planning efforts that inbound haul trucks would travel to the Project site using I-10, then travel north on Western Avenue to 7th Street, then east on 7th Street to Oxford Avenue. Outbound haul trucks would use the same route in reverse.

It is assumed that a majority of the construction workers would arrive at the construction site by personal vehicles during the a.m. peak hour and all depart during the p.m. peak hour. During the proposed Project construction period, daily haul/delivery truck trips would occur over an eight-hour period that begins during the a.m. peak hour and is completed during the p.m. peak hour.

Table 12 shows the construction Project trip generation calculations. It is estimated that the proposed Project would generate a total of 225 daily one-way weekday vehicle trips, including 66 a.m. peak hour

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact

trips and 66 p.m. peak hour trips.

Table 12
Construction Trip Generation

Trip Generation	Average Daily Trips			AM Peak Hour						PM Peak Hour					
				Truck Trips		Employee Trips		Total Trips		Truck Trips		Employee Trips		Total Trips	
	Trucks[a]	Emp.	Total	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out
Field Personnel	0	100	100	--	--	50	0	50	0	--	--	0	50	0	50
Construction Truck	125	0	125	8	8	--	--	8	8	8	8	--	--	8	8
Total Trips	125	100	225	8	8	50	0	58	8	8	8	0	50	8	58

[a.] Truck trips include a Passenger Car Equivalency (PCE) factor of 2.5.
Note: A maximum of 10 daily construction truck round trips would occur during the most intense construction period. Daily totals were multiplied by the PCE factor.
Source: KOA Corporation, June 2019.

Existing plus-Project Conditions

Project trips were added to the existing conditions analysis, to provide an existing plus-Project construction impact analysis. The existing and existing plus project construction traffic V/C and LOS values are provided in Table 13. Traffic impacts created by the proposed Project were determined by comparing the existing conditions to the existing Plus Project construction traffic conditions.

Table 13
Existing Plus Project Peak Hour Intersection LOS

No.	Intersection	Peak Hour	Existing Conditions		Existing Plus Project Conditions		Change in V/C	Sig. Impact?
			ICU or Delay	LOS	ICU or Delay	LOS		
1	Oxford Avenue and Wilshire Boulevard	AM	0.471	A	0.475	A	0.004	No
		PM	0.487	A	0.494	A	0.007	No
2	Serrano Avenue and Wilshire Boulevard	AM	0.466	A	0.471	A	0.005	No
		PM	0.546	A	0.549	A	0.003	No
3	Western Avenue and 7th Street	AM	0.500	A	0.516	A	0.016	No
		PM	0.501	A	0.526	A	0.025	No
4	Oxford Avenue and 7th Street[a]	AM	12.6	B	13.4	B	0.8	No
		PM	23.6	C	29.8	D	6.2	No

[a] Unsignalized intersection.
Note: LOS = Level of Service; Delay = Vehicle delay in seconds.
Source: KOA Corporation, June 2019.

As shown in Table 13, LADOT thresholds at the signalized study intersections would not be exceeded, and operations at the unsignalized intersection would not be at poor values of E or F. Therefore, construction of the proposed Project would result in less than significant traffic impacts in the Existing plus Project

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact

scenario.

Future without Project Conditions

To define future conditions without the Project, ambient traffic volume growth of one percent per year was added to the year-2018 traffic counts to define project-year 2021 conditions, in addition to trips from cumulative projects. A list of planned/pending projects was analyzed, and trip generation and general assignment was computed to provide this cumulative analysis and future baseline volumes. The trip generation of the cumulative projects within the Project vicinity are shown in Appendix H.

Future with Project Conditions

Project trips were added to the Future Without Project conditions analysis to provide the Future With Project construction impact analysis, which is summarized in Table 14.

Table 14
Future With Project Peak Hour Intersection LOS

No.	Intersection	Peak Hour	Existing Conditions		Existing Plus Project Conditions		Change in V/C	Sig. Impact?
			ICU or Delay	LOS	ICU or Delay	LOS		
1	Oxford Avenue and Wilshire Boulevard	AM	0.588	A	0.588	A	0.000	No
		PM	0.611	B	0.617	B	0.006	No
2	Serrano Avenue and Wilshire Boulevard	AM	0.597	A	0.599	A	0.002	No
		PM	0.675	B	0.678	B	0.003	No
3	Western Avenue and 7th Street	AM	0.760	C	0.776	C	0.016	No
		PM	0.762	C	0.784	C	0.022	No
4	Oxford Avenue and 7th Street[a]	AM	13.1	B	14.2	B	1.1	No
		PM	28.4	D	39.4	**E**	11.0	No

[b] Unsignalized intersection.
Note: LOS = Level of Service; Delay = Vehicle delay in seconds.
Source: KOA Corporation, June 2019.

As shown in Table 14, LADOT thresholds at the signalized study intersections would not be exceeded under the Future with Project condition, and operations at the unsignalized intersection would not reach capacity levels. LOS E conditions would be reached for the intersection of Oxford Avenue and 7th Street, but operations would be at the low end of this range, and under existing conditions this intersection operates at LOS D. Therefore, construction of the proposed Project would result in less than significant traffic impacts in the Future with Project scenario.

Alternative Modes of Transportation

The roadway network in the vicinity of the proposed Project site is served by Metro, Santa Monica Big Blue Bus, and LADOT's DASH Shuttle System. The nearest subway stop is the Metro Redline Wilshire/Western Station, approximately 0.13-mile northwest of the Project site. Bicycle facilities in the Project area include 7th Street, which is a designated Bicycle Lane. Pedestrian facilities serving the Project area include sidewalks around the perimeter of the Project site along Serrano Avenue, 7th Street, and Oxford Avenue. During construction, partial street closures along Serrano Avenue and 7th Street would be required for approximately 8 to 14 months. However, no transit lines currently travel along the streets surrounding the Project site (Serrano Avenue, 7th Street, and Oxford Avenue). The conversion of the on-street parallel

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
parking spaces along Serrano Avenue and 7th Street to angled spaces would require closure of the sidewalks in those areas during construction. Access along the sidewalks immediately adjacent to the Project site would be temporarily restricted during construction to ensure pedestrian safety. During this time, pedestrians can reroute to sidewalks on the opposite side of the street from the Project site. Upon completion of construction activities, complete access to all sidewalks would be fully restored. The proposed Project would also provide bicycle parking with approximately 75 bicycle parking spaces along the northern boundary of the Project site and approximately 21 bicycle parking spaces along the southern boundary of the property along 7th Street. Therefore, the proposed Project would not conflict with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. The impact would be less than significant. Reference: 19 (Traffic Analysis Technical Memorandum).				
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project would conflict or be inconsistent with CEQA Guidelines section 15064.3(b).				
Explanation: CEQA Guidelines section 15064.3 establishes vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts. VMT refers to the amount and distance of automobile travel attributable to a project. Section 4 of 15064.3, subdivision (b) defers to the lead agency for discretion to choose the most appropriate methodology to evaluate a project's VMT, including whether to express the change in absolute terms, per capita, per household or in any other measures. ~~Since BOE has not finalized its approach to VMT analysis, a qualitative analysis is provided below.~~ <u>The Los Angeles Department of Transportation (LADOT) release its updated Transportation Assessment Guidelines for VMT in July of 2019. The screening criteria in these new guidelines designates 250 or more daily vehicle trips generated as the threshold for requiring additional analysis. Based on an anticipated total of 225 generated weekday trips, the proposed Project does not require further VMT analysis.</u> The proposed Project would construct and operate of a new pocket park and underground parking structure on the site of the existing surface parking lot serving the Pio Pico Koreatown Library. The pocket park would serve the local community and existing users of the library, and thus, is not anticipated to generate an increase in vehicle trips during operation. Further, the proposed Project may reduce net operational VMT as community members would be able to frequent this neighborhood park instead of parks that are further away. During operation, the proposed Project would include a similar amount of parking spaces available compared to existing conditions. The proposed Project would also include bicycle parking and will be within walking distance of local bus stops, which encourages alternative transportation to the site. The impact would be less than significant.				
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project substantially increased road hazards due to a geometric design feature or incompatible uses.				
Explanation: The proposed Project involves the construction and operation of a pocket park and underground parking structure. The proposed Project would not substantially increase hazards due to a design feature or incompatible uses. The proposed project includes the conversion of the existing parallel street parking spots adjacent to the library property to angled parking spots, which would accommodate approximately 17 parking spaces along 7th Street and 11 parking spaces along Serrano Avenue. Both the Serrano Avenue and 7th Street roadways are 50 feet in width. Based on the City of Los Angeles Department of Building and Safety parking design standards, implementation of diagonal parking would be feasible on roadways of this width, with the acceptable angle of the spaces ranging from 30 degrees to 40				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
degrees. For the pocket park, landscaping and fencing would provide physical barriers between the playground area and the rest of the park. As discussed in item 11, Land Use and Planning, the proposed uses are consistent with the existing land use and zoning regulations governing development of the Project site. Additionally, the proposed park and parking structure would serve the existing community and would interface with the adjacent library. Thus, the proposed Project would not introduce an incompatible land use. Therefore, the proposed Project is not expected to generate any hazards from design features that would result in a safety hazard to pedestrians, personnel, visitors, or nearby neighbors. The impact would be less than significant.				
e) Result in inadequate emergency access?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project resulted in inadequate emergency access.				
Explanation: As previously discussed in item 9(f), partial street closures along Serrano Avenue and 7th Street would be required for approximately 8 to 14 months. However, ingress and egress to the site and surrounding properties, particularly for emergency response vehicles, would be maintained at all times during construction. Additionally, as listed in the Construction BMPs in Section II.E., Construction Schedule and Procedures, above, BOE would coordinate with all applicable agencies regarding construction schedules and worksite traffic control and detour plans, including LAPD and LAFD. Following construction, operation would not permanently alter the adjacent street system. The existing roadway widths would accommodate the conversion of the on-street parallel parking spaces along Serrano Avenue and 7th Street to angled spaces. In addition, the nearest local fire responders and police station would be notified, as appropriate, of construction schedules so as to coordinate emergency response routing during construction work, if necessary. Therefore, the impact would be less than significant.				
18. TRIBAL CULTURAL RESOURCES – Would the project cause a substantial adverse change in the significance of a tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or?	☐	☐	☒	☐
Standard: A significant impact may result if the proposed project caused a substantial adverse change to the significance of a tribal resource (as identified above).				
Explanation: Construction of the proposed Project would include earth-disturbing activities, such as excavation and grading. No previously identified archaeological resources associated with Native American culture have been identified within a 0.5-mile radius of the Project area, and no tribal cultural resources were identified in the archival research and outreach. Should any tribal cultural resources be identified during ongoing Native American consultation pursuant to AB 52, the City would consult with appropriate tribal representatives and incorporate a monitoring program for the proposed Project. Ongoing Native American consultation would ensure that impacts to previously unidentified tribal cultural resources would remain less than significant. Reference: 3 (Cultural Resources Assessment)				
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact

Standard: A significant impact may result if the proposed project caused a substantial adverse change to the significance of a tribal resource (as identified above).

Explanation: Though no previously identified archaeological resources associated with Native American culture have been identified within a 0.5-mile radius of the Project area, and no documented tribal cultural resources were identified in the archival research and outreach performed thus far, the Native American representatives contacted for the Project indicated that the area is potentially sensitive for tribal cultural resources due to the presence of nearby local historical waterways that are no longer present.. Mitigation measures CUL-1 and CUL-2 could be implemented during construction and would include further consultation with Native American parties. As presented in Appendix C, prior to circulation of the Draft IS/MND, the City submitted a request to the Native American Heritage commission (NAHC) for a CEQA Tribal Consultation List pursuant to AB52 for the proposed Project. In January of 2018, the City sent a formal notice to the California Native American Tribes identified by NAHC, as well as others with a potential interest in the Project, informing them of the City's decision to undertake the proposed Project and requesting a response from the Tribes within 30 days if they wished to consult on the Project (see Appendix C). Four tribes responded with interest in the Project and consultation occurred in January and February of 2018. They City closed consultation with the four tribes in September of 2019 informing the tribes of the determination made in this section pertaining to tribal cultural resources. This correspondence and other pertinent information to the AB52 consultation process are maintained in a confidential appendix to this IS/MND (Appendix I) pursuant to AB52 requirements and PRC 21082.3. With the implementation of mitigation measure CUL-1 and CUL-2, and ongoing consultation with Native American representatives, impacts to archaeological resources, including tribal cultural resources, would be less than significant.

Mitigation Measures

CUL-1. A qualified archaeological monitor shall be present during all ground-disturbing activities within the upper 7.5 feet of disturbed local materials at the Project site, to evaluate and determine appropriate treatment for the resource in accordance with 36 CFR § 800.13(b) (3) and PRC Section 21083.2(i). The archaeological monitor and any Native American monitor(s) as described below shall train the construction crews in regard to identifying potential archaeological resources (including Native American artifacts). The archaeological monitor shall have the authority to stop work if archaeological, including Native American resources, are found within the disturbed local deposits in the upper 7.5 feet of excavated material. If any Native American cultural material is encountered within the upper 7.5 feet of materials, consultation with interested Native American parties will be conducted to apprise them of any such findings and solicit any comments they may have regarding appropriate treatment and disposition of the resources, as per CUL-2. If archaeological resources are encountered during ground-disturbing activities in the undisturbed native Pleistocene material below 7.5 feet from ground surface, work shall be temporarily halted in the vicinity of the find and the archaeologist shall be called to the Project area to examine and evaluate the resource in accordance with the provisions of the National Historic Preservation Act (NHPA) and CEQA, including any Native American monitors, as per mitigation measure CUL-2.

CUL-2. A trained Native American consultant or consultants shall be engaged to monitor ground-disturbing activities as described in CUL-1. The consultant or consultants shall be selected from the interested Native American parties who consulted on the project. This selection and monitoring shall occur on an as-needed basis as determined by BOE in consultation with interested tribes and shall be intended to ensure that Native American concerns are taken into account during the construction process. The Native American consultant shall report findings to BOE or its archaeological consultant, who will disseminate the information to the consulting Native American parties. The Native American parties identified by the NAHC shall be consulted regarding the treatment and final disposition of any materials of Native American origin found during the course of the project, if any, and will assist BOE in determining whether these materials constitute tribal

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
cultural resources. Reference: 3 (Cultural Resources Assessment)				
19. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project resulted in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities that could result in an adverse environmental effect that could not be mitigated.				
Explanation: Construction activities are anticipated to occur for approximately 18 months and would require water for activities such as dust control and electricity for equipment. However, these activities are limited and temporary, and would not consume large amounts of water or electricity, requiring the construction of new water treatment or electric facilities; therefore, construction impacts would be less than significant. The proposed Project would operate a new underground parking structure and pocket park on the site of an existing paved surface parking lot. Water would be used, and wastewater would be generated, for irrigation of the landscaped areas of the proposed pocket park. In addition, to provide adequate facilities for the anticipated users of the park and existing library, the existing restroom facilities within the library would be expanded and upgraded. This would represent a net increase in the amount of water used and wastewater generated at the Project site over existing uses. However, the total Project site is 0.6-acre in area and the landscaped elements would be limited to trees, shrubs, and planter areas scattered throughout the park. Thus, the area requiring irrigation would be relatively small. The minor upgrades to the existing restroom facilities would include four additional stalls, and would generate a nominal increase in water use and wastewater generated. The proposed project would comply with all applicable water conservation policies and regulations in order to minimize water demand at the project site. Therefore, the proposed project would not require or result in the construction of new or expanded water or wastewater treatment facilities, and the impact would be less than significant. Runoff from the Project site is currently collected by storm water drainage facilities in the surrounding roadway. The Project site is currently developed with a paved surface parking lot and is primarily covered with impermeable surfaces. With implementation of the proposed Project, the permeable surfaces at the Project site would be increased with the addition of landscaped areas. As such, the proposed Project would reduce storm water flows from the Project site. Any runoff leaving the Project site would continue to drain to the existing storm drain inlets in the surrounding area. Therefore, the proposed Project would not require or result in the construction of new or expanded storm water drainage facilities. The impact would be less than significant. Nominal amounts of electricity would be required for the proposed Project during operation as the design of the park would incorporate lighting utilizing LED fixtures. Existing electricity service is provided to the site by LADWP, and the proposed Project would not result in the relocation or construction of new or expanded electric power facilities. The impact would be less than significant. No impact related to natural gas or telecommunications facilities would occur. Reference: 15 (NavigateLA)				
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project's water demands would exceed the				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
existing and projected water supplies that serve the site.				
Explanation: Construction activities are anticipated to occur over an approximate 18-month period and would require water for activities such as dust control. However, these activities are limited and temporary, and would not consume large amounts of water. Existing water supplies would be sufficient; therefore, construction impacts would be less than significant. High water demand is typically associated with residences, hotels, and large offices. The proposed Project includes operation of a pocket park and underground parking structure and would not include land uses that require substantial water supply. As previously discussed, the proposed Project would increase the amount of water used at the Project site due to an increase in landscaped areas and the need for irrigation. However, the landscaped elements would be limited to trees, shrubs, and planter areas scattered throughout the 0.6-acre Project site. Thus, the area requiring irrigation would be relatively small. The proposed Project would also expand and upgrade the library's existing restroom facilities to provide adequate facilities for the anticipated users of the park and existing library. This would result in a minor increase in water usage. Sufficient water supplies would be available to serve the proposed Project from during normal, dry, and multiple dry years. The impact related to water supply would be less than significant.				
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 the provider's existing commitments?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project would increase wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded.				
Explanation: See items 19(a) and 19(b) above. The impact would be less than significant.				
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impact the attainment of solid waste reduction goals?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project were to increase solid waste generation to a degree that existing and projected landfill capacities would be insufficient to accommodate the additional waste, or if the proposed project would conflict with solid waste reduction goals.				
Explanation: The proposed Project would excavate and haul away approximately 10,000 cubic yards of material. There are no City-owned landfills currently in operation; therefore, waste from the proposed Project would be hauled to private or County-operated landfills. The City standard for public works requires demolition debris to be recycled where feasible, in accordance with the Citywide Construction and Demolition Debris Recycling Ordinance. Thus, the amount of solid waste generated during construction of the proposed Project would be minimized. Construction impacts related to landfill capacity would be less than significant. The implementation of the proposed Project is anticipated to result in an increase in visitors to the Project site. As such, the operation of the proposed Project would result in an increase in solid waste generation over existing conditions. Large volumes of solid waste generation are typically associated with residences, large offices, and commercial uses. The proposed Project would not include any of these uses and is not anticipated to generate a large net increase in solid waste generation over existing conditions. Thus, a substantial increase in solid waste generation would not be expected to occur, and the existing remaining landfill capacity would accommodate the proposed Project. Operational impacts related to landfill capacity would be less than significant.				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐
Standard: A significant impact may occur if the proposed project would generate solid waste that was in excess of or was not disposed of in accordance with applicable regulations.				
Explanation: The proposed Project would be designed, constructed, and operated following all applicable laws, regulations, ordinances, and formally adopted City standards regarding solid waste disposal. The proposed Project would incorporate source reduction techniques and recycling measures and maintain a recycling program to divert waste in accordance with the Citywide Construction and Demolition Debris Recycling Ordinance. The impact would be less than significant.				
20. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project is located in or near state responsibility areas or lands classified as very high fire hazard severity zones, and may substantially interfere with roadway operations used in conjunction with an emergency response plan or evacuation plan or would generate sufficient traffic to create traffic congestion that would interfere with the execution of such plan.				
Explanation: The Project site is not located within a state responsibility area or a designated very high fire hazard severity zone. The Project site and surrounding areas are completely developed. Therefore, construction and operation of the proposed Project would not introduce or exacerbate wildfire risks or impair emergency response plans or emergency evacuation plans. No impact would occur. Reference: 14 (ZIMAS).				
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project is located in or near state responsibility areas or lands classified as very high fire hazard severity zones, and if construction or operation of the proposed project would expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.				
Explanation: The Project site is not located within a state responsibility area or a designated very high fire hazard severity zone. The Project site and surrounding areas are completely developed and there are no wildlands adjacent to the site. Therefore, construction and operation of the proposed Project would not exacerbate wildfire risks, thereby exposing project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact would occur. Reference: 14 (ZIMAS).				
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project is located in or near state responsibility areas or lands classified as very high fire hazard severity zones, and if the proposed project resulted in installation or maintenance of associated infrastructure that could result in exacerbated fire risk that could not be mitigated.				

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Explanation: The Project site is not located within a state responsibility area or a designated very high fire hazard severity zone. The Project site and surrounding areas are completely developed, and the proposed Project would not require the installation of maintenance of roads, fuel breaks, emergency water sources, power lines or other utilities. Therefore, construction and operation of the proposed Project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. No impact would occur. Reference: 14 (ZIMAS).				
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒
Standard: A significant impact may occur if the proposed project is located in or near state responsibility areas or lands classified as very high fire hazard severity zones, and if the proposed project were located in a hillside area with conditions that would suggest high potential for sliding or flooding and appropriate design measures were not implemented.				
Explanation: The Project site is not located within a state responsibility area or a designated very high fire hazard severity zone. The Project site and surrounding areas are completely developed, and the Project site is flat and does not contain slopes. Therefore, construction and operation of the proposed Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. No impact would occur. Reference: 14 (ZIMAS).				
21. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
Comment: No plant or animal species listed on any state or federal lists for endangered, threatened or special status species were identified on-site. However, ornamental trees may provide suitable nesting habitat for birds protected under the MBTA. Additionally, noise and dust generated during construction could indirectly impact nesting birds by causing them to avoid the area during construction. Should tree removal and construction activities occur during the nesting bird season, the implementation of the mitigation measure BIO-1 would ensure that no nesting birds protected under the MBTA are significantly affected. There are no known cultural resources located on-site. However, there is the potential to encounter previously unknown cultural resources during construction. Mitigation measures CUL-1, CUL-2, and GEO-1 are provided to address the potential discovery of previously unknown archaeological or paleontological resources. Implementation of these mitigation measures would ensure that potentially significant impacts would be less than significant.				
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)?	☐	☐	☒	☐

Issues	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant	No Impact
Comment: There are 76 related projects that would occur within the immediate vicinity of the Project area that are being tracked for purposes of understanding potential cumulative traffic impacts. These related projects are evaluated in item 17(a), and potential additive traffic impacts are discussed. Further discussion of related-projects can be found in Appendix H of this IS/MND. Project-level traffic impacts during construction were less than significant. Therefore, no mitigation measures are required. As a result, construction of the project would not result in a cumulatively considerable contribution to a significant cumulative traffic impact to construction. No traffic impacts would occur during Project operation. Based on the above, significant cumulative impacts from related-projects are not anticipated in any of the impact categories. The proposed Project is consistent with local and regional land use, air quality, water quality, and transportation plans. In addition, the proposed Project is not expected to make a cumulatively considerable contribution to a significant cumulative impact. The impact would be less than significant.				
c) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?	☐	☐	☐	☒
Comment: The overall purpose of the proposed Project is to provide a public open green park space for the Koreatown neighborhood, which is currently lacking in parkland. The proposed Project includes construction of new facilities and implementation of construction BMPs. Therefore, the overall Project is anticipated to have positive long-term impacts to the environment. No impact is anticipated.				
d) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐
Comment: With implementation of the mitigation measures identified for all potentially significant impacts, the proposed Project is not anticipated to have significant impacts that would cause substantial adverse effects on human beings, either directly or indirectly. Therefore, all potentially significant environmental effects associated with the proposed Project can be mitigated to less than significant levels.				

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