

INITIAL STUDY/ENVIRONMENTAL CHECKLIST

FOR THE

SIDEWALK REPAIR PROGRAM

City of Los Angeles, Department of Public Works
Bureau of Engineering, Environmental Management Group
1149 S. Broadway, Suite 600
Los Angeles, CA 90015
Contact: Shilpa Gupta, Environmental Supervisor I
213-485-4560
Shilpa.Gupta@lacity.org



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Chapter 1

Introduction

The City of Los Angeles Bureau of Engineering (BOE) has prepared this Initial Study (IS) and Environmental Checklist to evaluate the potential environmental impacts associated with the Sidewalk Repair Program (proposed Project).

One of the main objectives of the California Environmental Quality Act (CEQA) is to disclose the potential environmental effects of proposed activities on the public and decision-makers. Under CEQA, BOE as the lead agency has prepared this IS and Environmental Checklist and determined that an environmental impact report (EIR) is needed. CEQA requires that the potential environmental effects of a project be evaluated prior to implementation. This IS includes a discussion of the proposed Project's effects on the existing environment and identifies potential avoidance, minimization, and mitigation measures.

Authority

CEQA was enacted in 1970 and is codified in the California Public Resources Code (Sections 21000 et.al.). The CEQA statute contains detailed rules governing the content of environmental documents and the environmental review process by state and local agencies. The environmental review process provides decision-makers and the public with information regarding environmental effects of a proposed project, identifies means of avoiding environmental damage, and discloses to the public the reasons behind a project's approval even if it leads to environmental impacts. BOE has determined the proposed Project is subject to CEQA, and no exemptions apply.

This IS has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.) and the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.).

Lead, Responsible, and Trustee Agencies

The City of Los Angeles is the lead agency for the proposed Project, pursuant to Section 15367 of the State CEQA Guidelines, because it has the greatest degree of discretion to approve or deny the proposed Project. Approvals of permits include, but are not limited to, those required during final design of public facilities and construction contracts.

In addition to the lead agency, several other agencies have special roles with respect to the proposed Project as responsible or trustee agencies. These agencies will use the EIR once prepared as the basis for their decisions to issue any approvals and/or permits that may be required. Permits and approvals noted in Table 3 are anticipated to be required to implement the proposed Project.

Scope of the Initial Study

This IS evaluates the proposed Project's effects on the following resource areas:

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

Impact Terminology

The following terminology is used to describe each impact's level of significance:

Potentially Significant Impact. This category is only applicable if there is substantial evidence that an effect may be significant, and no feasible mitigation measures can be identified to reduce impacts to a less-than-significant level.

Less than Significant After Mitigation Incorporated. This category applies where the incorporation of mitigation measures would reduce an effect from a "Potentially Significant Impact" to a "Less-than-Significant Impact." The lead agency must describe the mitigation measure(s), and briefly explain how it would reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced).

Less-than-Significant Impact. This category is identified when a proposed project would result in impacts below the threshold of significance, and no mitigation measures are required.

No Impact. This category applies when a proposed project would not create an impact in the specific environmental issue area. "No Impact" answers do not require a detailed explanation if they are adequately supported by the information sources cited by the lead agency, which show that the impact does not apply to the specific project (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., a proposed project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

BOE and other public agencies have identified applicable "thresholds of significance" for certain types of environmental impacts, such as traffic, noise, and air quality impacts. Thresholds of significance for the proposed Project are based on the *City of Los Angeles CEQA Thresholds Guide* (2006), and are identified in this IS where applicable.

Document Format

This IS contains six chapters:

Chapter 1. Introduction. This chapter provides an overview of the proposed Project and the CEQA environmental documentation process.

Chapter 2. Project Description. This chapter provides a detailed description of the proposed Project objectives and components.

Chapter 3. Initial Study Environmental Checklist. This chapter presents the CEQA checklist for all impact areas and mandatory findings of significance.

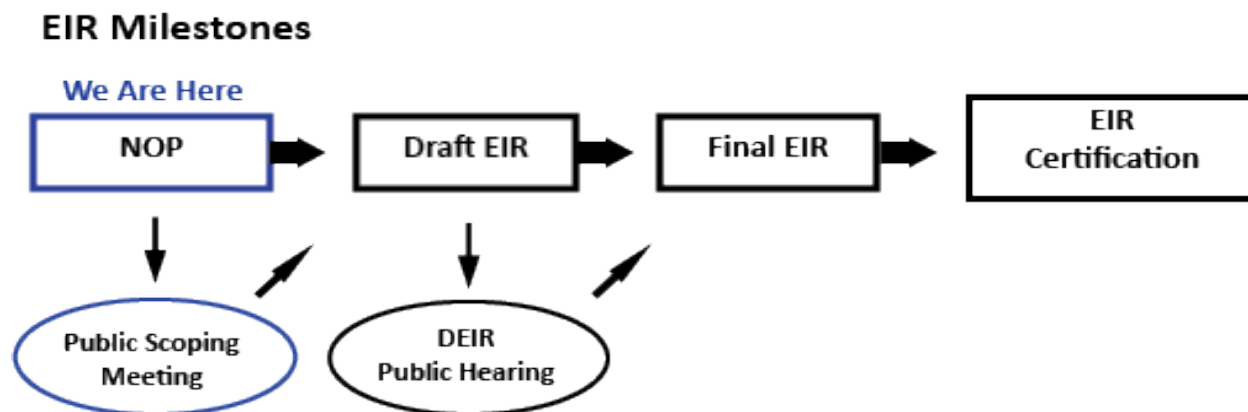
Chapter 4. References. This chapter provides a list of reference materials used during the preparation of the IS.

Chapter 5. Preparers and Contributors. This chapter provides a list of key personnel involved in the preparation of the IS.

Chapter 6. Acronyms and Abbreviations. This chapter provides a list of acronyms and abbreviations used throughout the IS.

CEQA Process and Availability of the Initial Study

EIR Process Overview



The CEQA process is initiated when the lead agency identifies a proposed project. The lead agency then normally prepares an IS to identify the preliminary environmental impacts of the proposed project. This IS determined that the proposed Project could have significant environmental impacts that would require further study and the need to implement mitigation measures. Therefore, the lead agency has decided to prepare an EIR. A Notice of Preparation (NOP) is prepared to notify public agencies and the general public that the lead agency is starting the preparation of an EIR for the proposed Project. The NOP and IS are typically circulated for a 30-day review and comment period. During this review period, the lead agency requests comments from agencies, interested parties, stakeholders, and the general public on the scope and content of the environmental information to be included in the Draft EIR.

After the close of the comment period for the IS, the lead agency will continue the preparation of the Draft EIR and associated technical studies (if any). Once the Draft EIR is complete, a Notice of Availability (NOA) is prepared to inform agencies and the general public of the availability of the document and where the document can be reviewed. The Draft EIR and NOA are typically circulated for a 45-day review period to provide agencies and the general public an opportunity to comment on the adequacy of the analysis and the findings regarding potential environmental impacts of the proposed Project.

After the close of the comment period, responses to all comments received on the Draft EIR are prepared. The lead agency prepares a Final EIR, which incorporates the Draft EIR or revisions to the Draft EIR, Draft EIR comments and list of commenters, and a response to comments discussion. In addition, the lead agency must prepare findings of fact for each significant effect identified, a statement of overriding considerations if there are significant impacts that cannot be mitigated, and a mitigation monitoring and reporting program (MMRP) to ensure that all proposed mitigation measures are implemented.

The Board of Public Works will consider the Final EIR and make a recommendation to the Los Angeles City Council (Council), as the governing body of the City of Los Angeles (City), regarding certification of the Final EIR and proposed Project approval. The Council may certify and approve the Final EIR or may choose to not approve the proposed Project.

During the environmental review and project approval process, people and/or agencies may address the Board of Public Works and Council regarding the proposed Project. Public notification of agenda items for the Board of Public Works are available at:

<http://bpw.lacity.org/Agendas.html>

Council agenda items are posted 72 hours prior to the public meeting. Agendas can be accessed via the internet at the following location:

<http://lacity.org/city-government/elected-official-offices/city-council/council-calendar>.

Alternatively, agendas can be obtained by visiting City Hall:

City Hall
200 North Spring Street
John Ferraro Council Chamber, Room 340
Los Angeles, CA 90012

Within five days of project approval, the BOE will file a Notice of Determination (NOD) with the County Clerk. The NOD will be posted by the County Clerk within 24 hours of receipt. This begins a 30-day statute of limitations on legal challenges to the CEQA approval by the lead agency. The ability to challenge the approval in court may be limited to those persons who objected to the approval of the proposed Project and to issues that were presented to the lead agency by any person in writing during the public review and comment periods regarding the EIR.

Availability of the Initial Study

In accordance with the CEQA statutes and Guidelines, the NOP/IS is being circulated for a minimum of 30 days for public review and comment. The public review period for this NOP/IS is scheduled to begin on July 27, 2017, and will conclude on September 15, 2017. The NOP/IS has been distributed to interested or involved public agencies, organizations, and private individuals for review. The NOP/IS is available online at:

<http://sidewalks.lacity.org/environmental-review-process>

Copies are available for review at 35 library locations, as listed in Appendix A. For example, these locations include:

- San Pedro Regional Library, 931 S. Gaffey Street, San Pedro, CA 90731
- Westwood Branch Library, 1246 Glendon Avenue, Los Angeles, CA 90024
- Los Angeles Central Library, 630 W. 5th Street, Los Angeles, CA 90071
- Encino-Tarzana Branch Library, 18231 Ventura Boulevard, Tarzana, CA 91356

Approximately 630 notices were sent to community residents, stakeholders, and local agencies about the availability of the NOP/IS and the opportunity to attend a public meeting to learn more about the proposed Project and provide comments on the NOP/IS.

Scoping Meetings

Three public scoping meetings will be held to obtain input on the NOP/IS and the scope and contents of the EIR:

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

During the scoping period, the public has the opportunity to provide written comments on the information contained within this NOP/IS or provide comments at a public meeting. Comments on the NOP/IS and responses to comments will be included in the record and considered by BOE during preparation of the Draft EIR.

In reviewing the NOP/IS, responsible and trustee agencies and interested members of the public should focus on the sufficiency of the document in identifying and analyzing potential proposed Project impacts on the environment, and ways in which the potential significant effects of the proposed Project could be avoided or mitigated. Comments on the NOP/IS should be submitted in writing by **September 15, 2017**. Please submit written comments to:

Shilpa Gupta, Environmental Supervisor I
Los Angeles Bureau of Engineering, Environmental Management Group
1149 S. Broadway, Suite 600, Mail Stop 939
Los Angeles, CA 90015

Written comments may also be sent via email to Shilpa.Gupta@lacity.org. Comments sent via email should include “SRP” in the subject line and a valid mailing address in the email.

If you have any questions regarding the environmental review process for the proposed Project, you can go to:

<http://sidewalks.lacity.org/environmental-review-process>

or contact:

Shilpa Gupta, Environmental Supervisor I
Los Angeles Bureau of Engineering
213.485.4560
Shilpa.Gupta@lacity.org

Introduction and Overview

The proposed Project would repair and upgrade sidewalks and curb ramps throughout the City. Figure 1 shows the proposed Project location. In August 2010, a class action lawsuit between the Willits et al. plaintiff group and the City of Los Angeles addressed the need to repair damaged sidewalks in the City to ensure compliance with the Americans with Disabilities Act (ADA) and the Rehabilitation Act of 1973. In May 2015, the Council approved the *Willits v. City of Los Angeles* Settlement Term Sheet (Settlement), which includes various City actions that provide improved access to persons with mobility disabilities in accordance with local, state, and federal accessibility requirements.

The proposed Project would implement improvements to pedestrian facilities over approximately 30 years. The Settlement defines pedestrian facilities as “any sidewalk, intersection, crosswalk, street, curb, curb ramp, walkway, pedestrian right-of-way (ROW), pedestrian undercrossing, pedestrian overcrossing, or other pedestrian pathway or walkway of any kind that is, in whole or in part, owned, controlled or maintained by or otherwise within the responsibility of the City of Los Angeles.” The broad purpose of the proposed Project is to make City pedestrian facilities compliant with applicable accessibility requirements. Street tree removals and replacements, along with utility relocations may be needed. The City may adopt policies and/or ordinances to assist in the administration of the proposed Project and its objectives.

Project Background

The City maintains approximately 11,000 miles of sidewalks. Conditions of these existing sidewalks vary greatly, as depicted on Figure 2. This figure also documents deteriorating infrastructure and the necessity to comply with applicable accessibility requirements. The City’s Bureau of Street Services (BSS) has historically been responsible for routine sidewalk repairs and maintenance throughout the City. However, the 2010 *Willits v. City of Los Angeles* class action lawsuit prompted the City to accelerate and improve sidewalk repair efforts by developing the Safe Sidewalks LA Program.

In February 2015, the Council instructed BOE to work with various other City departments and utilize the existing City contracts for sidewalk repairs adjacent to City facilities as matter of “urgent necessity” and established BOE as the program manager.

In May 2015, the Council approved the Settlement, and the City Administrative Officer (CAO) released a report that recommended sidewalk repair policies for a City program that (1) is permanent and ongoing, (2) is consistent with the Settlement, (3) shares responsibility for maintenance and repair with adjacent property owners, and (4) ensures accessibility in areas with the most significant safety hazards. The CAO report was prepared in consultation with the various City departments and agencies. According to the CAO report, the City should prioritize sidewalk-related access improvements addressing access barriers and the most significant safety hazards. The City launched Safe Sidewalks LA in 2016 to begin to meet these requirements.

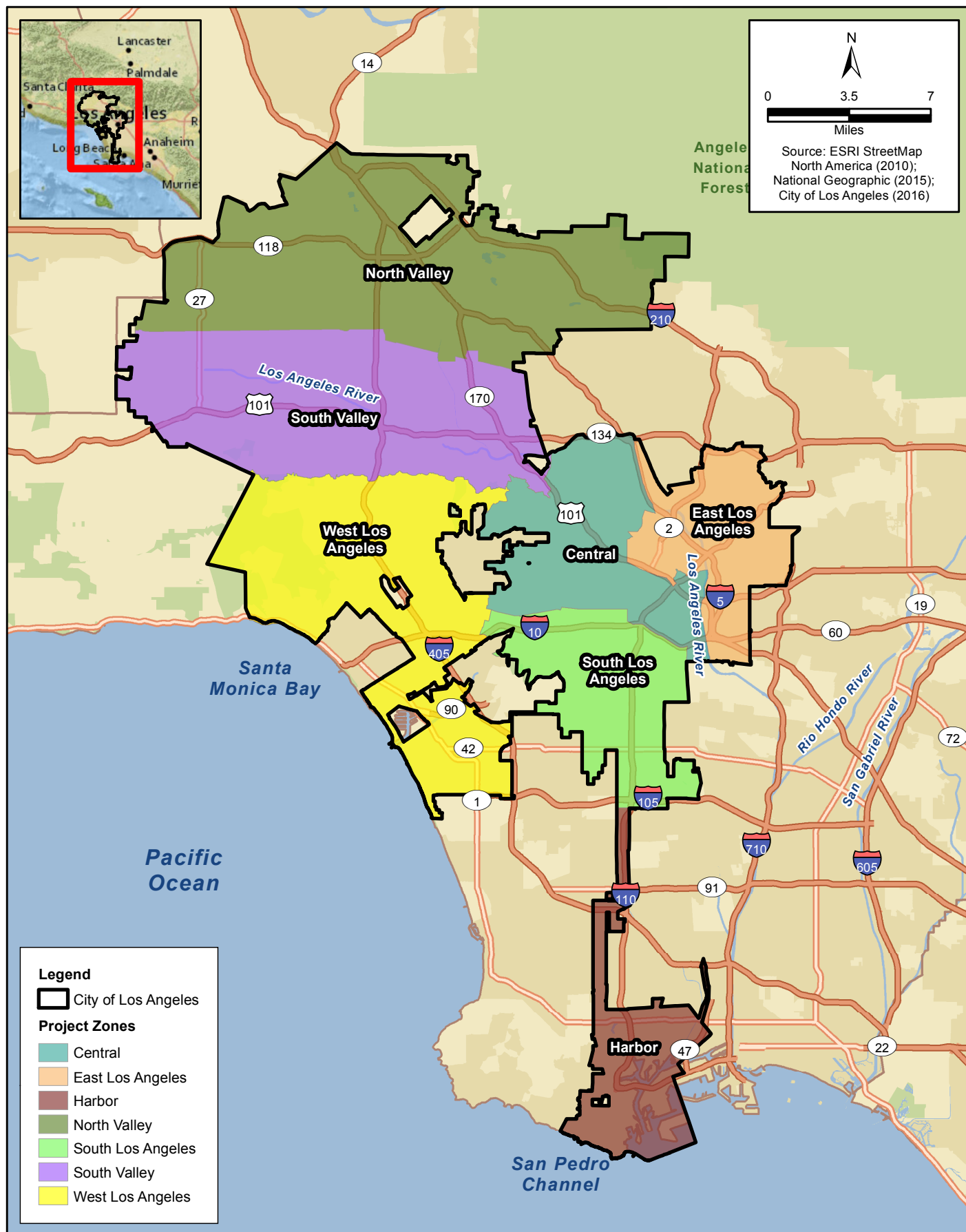


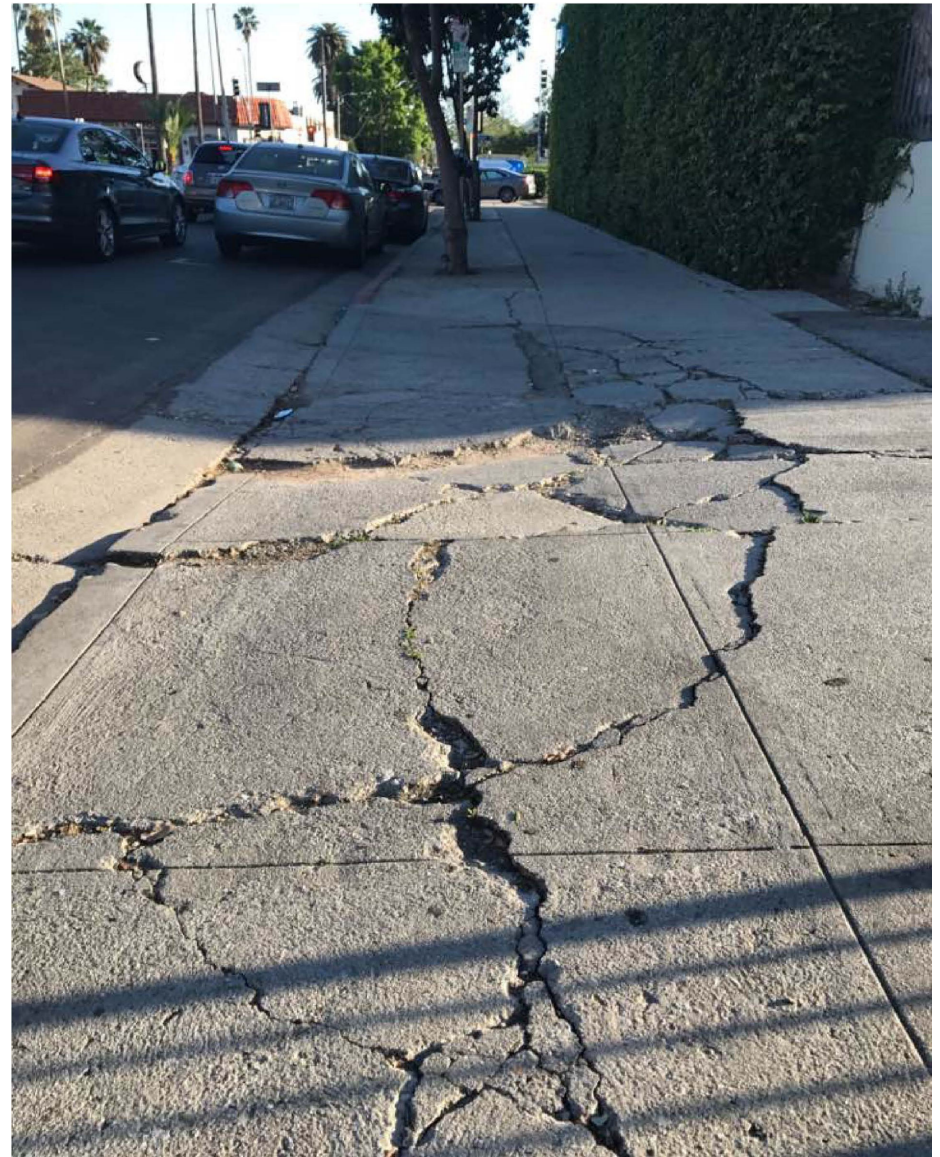
Figure 1
Project Location
Sidewalk Repair Program



Curb Ramp Needed



Uplift



Cracking

Figure 2
Examples of Sidewalk Damage and Access Barriers
Sidewalk Repair Program

However, additional Council approvals, including certification of an EIR in compliance with CEQA, are required to expand current activities and implement Safe Sidewalks LA over the next approximately 30 years. Sections 15300 to 15322 of the State CEQA Guidelines identify classes of projects that are categorically exempt from provisions of CEQA because they do not ordinarily result in a significant effect on the environment. Minor repairs to existing sidewalks typically fit the definition of a Class 1 existing facility identified under Section 15301 (c). As the proposed Project consists of a long-term sidewalk repair program, with an expected consistent level of funding and activities, additional review under CEQA is required to analyze the impact of these activities collectively, over time. The proposed Project will potentially result in the removal of large quantities of mature street trees, as well as temporary street and sidewalk closures during construction activities. The street trees are expected to be replaced at a 2:1 ratio consistent with current City policy (Board of Public Works street tree removal permit process and policy). The Draft EIR will identify the environmental impacts associated with the implementation of Safe Sidewalks LA and recommend appropriate mitigation measures, as necessary.

Safe Sidewalks LA Program

Under California law, property owners are responsible for the repair and maintenance of all sidewalks, driveway approaches, curb returns, and curbs on their property. In 1973, the City voluntarily took over the responsibility to repair and maintain these improvements if the damage was caused by root growth from public street trees. In November 2016, the City adopted an ordinance amending Section 62.104 of the Los Angeles Municipal Code and established a fix and release program. Through the ordinance and fix and release program, responsibility for the repair and maintenance of sidewalks, driveway approaches, curb ramps, and curbs is transferred back to the property owner. The transfer of responsibility occurs after the City inspects the sidewalk for ADA compliance. If the inspection reveals that the sidewalk is non-compliant with the ADA, then the City repairs the sidewalk, to achieve compliance, up to \$20,000 per lot.

Once a sidewalk is repaired and complies with applicable accessibility requirements, BOE issues a Certificate of Sidewalk Compliance. When issued, a 20-year Sidewalk Repair Warranty for residential property and a 5-year warranty for commercial property begins. During the warranty period, the City guarantees a one-time repair of the sidewalk as deemed necessary. However, the Sidewalk Repair Warranty would be waived if the property owner elects to retain a street tree that has been recommended for removal. Repairs to these sidewalks would be the sole responsibility of the property owner.

In general, Safe Sidewalks LA offers three programs for constituents to repair sidewalks: Access Request, Rebate, and Report a Sidewalk Problem. These programs are currently being implemented in an effort to comply with the Settlement and address access barriers.

Ongoing repairs conducted under Safe Sidewalks LA are currently performed adjacent to City facilities and through the Access Request and Rebate programs. These requests are made by constituents and received through the MyLA 311 service request system.

Access Request

Under the Access Request program, individuals with a mobility disability may submit a request to the City for sidewalk repairs due to physical access barriers such as broken sidewalks, missing or broken curb ramps, or other access barriers in the public right-of-way.

Rebate

Under the Rebate program, any residential or commercial property owner may voluntarily undertake sidewalk repair work that meets accessibility requirements, and then receive a rebate in a specified amount. The Rebate Program is intended to accelerate sidewalk repairs in residential and commercial areas and leverage available City funds.

Report a Sidewalk Problem

Under Report a Sidewalk Problem, the general public may report a sidewalk in need of repair.

Prioritization Matrix and Scoring System

As required under the terms of the Settlement in conjunction with criteria set forth by the Council, BOE has developed a sidewalk repair Prioritization Matrix and Scoring System (Prioritization System) to guide implementation of Safe Sidewalks LA. Due to the significant number of requests received for sidewalk repair, the Prioritization System will help to provide clear and objective guidance for prioritizing work. The Prioritization System will not be applicable to the Rebate Program, and it will be presented to Council for consideration.

Project Objectives

The proposed Project is intended to meet the following objectives:

1. Comply with the requirements of the Settlement Agreement, and amend the existing program, as needed, for sidewalk and curb ramp repairs within the City in accordance with applicable accessibility requirements. Street tree removal and replacement, and utility relocation may occur, as necessary, for implementation.
2. Identify criteria for street tree preservation, and removal and replacement requirements where street trees are the cause of sidewalk damage and recommend policies and/or an ordinance related to these criteria to implement the proposed Project.
3. Consider the City's sustainability goals when implementing the Sidewalk Repair Program.

Proposed Project

Proposed Project Activities

The proposed Project would continue, amend, and expand implementation of Safe Sidewalks LA over the next 30 years to meet the provisions of the approved Settlement Agreement. Existing sidewalks and walkways, and gaps of missing sidewalks, would be repaired or replaced under the proposed Project.

Work under the proposed Project may include the following types of improvements to meet applicable accessibility requirements:

- Installation of missing curb ramps.
- Repair of street tree damage to sidewalk or walkway surfaces.

- Upgrades to existing curb ramps.
- Repair of broken and/or uneven pavement in the pedestrian rights of way.
- Repair of vertical or horizontal displacement or upheaval of the sidewalk or crosswalk surfaces.
- Correction of non-compliant cross-slopes in sidewalks or sections of sidewalks.
- Removal of protruding and overhanging objects and/or obstructions.
- Widening of restricted pedestrian rights-of-way when required.
- Providing clearance to the entrances of public bus shelters.
- Repair of excessive gutter slopes at the bottom of curb ramps leading into crosswalks.
- Elimination of curb ramp lips on curb ramps.
- Installation of utility covers.
- Repair of driveways, curb and gutter.
- Street tree preservation, removal, and/or replacement.
- Street tree root pruning and canopy pruning as appropriate.
- Installation of tree wells and other compliant remediation.
- Addressing other non-compliant accessibility conditions, as required.

Proposed Sidewalk Repair Program Ordinance and/or Policy Related to Street Trees

As part of the proposed Project, an ordinance and/or policy could be developed to establish criteria for street tree preservation, and removal and replacement where street trees are the cause of sidewalk damage. A proposed ordinance or policy could guide proposed Project implementation and establish a more efficient approval procedure. The ordinance could set forth ministerial permit requirements for street tree removal and replacement for work conducted under the proposed Project. The City's current practice is to obtain permits for street tree removals when conducting sidewalk repairs. The current Board of Public Works Street Tree Removal Permit Process and Policy (Policy) sets the requirements for replacement, such as ratio, size, and location, and generally requires a 2:1 ratio of street tree replacement within the City. While this replacement ratio is expected to continue for the proposed Project, additional policies related to street tree preservation and replacement may be developed. As the City develops criteria for street tree preservation, and removal and replacement requirements for the proposed Project, the criteria could be reflected in the proposed ordinance and/or modified Policy. Proposed language for a draft Sidewalk Repair Program ordinance or policy related to street trees would be included in the Draft EIR for public and agency review and comment. Table 1 identifies the various environmental resource sections in this Initial Study that discuss street tree preservation, removal, and replacement activities.

Table 1. Initial Study Environmental Resource Areas that Discuss Street Tree Preservation, Removal, and Replacement Activities

Initial Study Environmental Resource Areas	Page Number
I. Aesthetics	3-4
IV. Biological Resources	3-13
V. Cultural Resources	3-18
VII. Greenhouse Gas Emissions	3-24
VIII. Hazards and Hazardous Materials	3-26
IX. Hydrology and Water Resources	3-31
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Typical Construction Scenarios

To quantify the potential environmental impacts associated with the proposed Project, construction scenarios have been created to best describe the type of work that would likely occur at each proposed Project site. It should be noted that the actual construction process and schedule would be determined by the contractor at the time of construction; therefore, the information presented below should be regarded as illustrative of similar typical construction processes. Repairs requiring new ROW or access easements may, be needed to meander around a tree to complete repairs. Additionally, repairs occurring within culturally sensitive areas will be discussed in the Cultural Resource section of the EIR.

The following two prototypical construction scenarios were developed for the purposes of the environmental impact analysis. It is assumed for the purposes of this analysis that each construction scenario would be analyzed by parcel (i.e., each individual property owner) and by block (i.e., several repairs occurring at the same time within a city block). Impacts would be addressed at the local level (parcel/block), as well as aggregated into an annual average expected level of activity. These scenarios are representative of various configurations depending on the conditions of each site. All construction activities may not occur at each proposed Project location. These scenarios represent the range and general durations of the construction activities that may occur. For example, not all sidewalk repairs would involve street tree removals.

Scenario 1: Sidewalk Repair with Curb Ramp Repairs, Street Tree Removals and Replacements, and Minor Utility Work

This scenario represents combinations of the following construction activities:

- Sidewalk repair work, including fixing broken concrete, cracks, uplifts, driveways, curb and gutter, and making required accessibility improvements such as cross slope work.
- Curb ramp repairs or installation.

- Street tree removal and replacement.
- Minor utility work such as utility box adjustments.

Sidewalk Repair

Typical sidewalk repair for sidewalks, driveways, curb and gutter, and curb ramps in any one location typically takes 3–4 days for construction: for example, 1 day for demolition of existing sidewalk; 1 day for grading and formwork; 1 day for construction; and 1 day for cleanup and restoring the parkway. Repairs for an entire block face can take around 2 weeks for a standard 9-person crew. In some instances, soil compaction may be required. The depth of excavation for sidewalks usually would not be greater than 8 inches: 3–4 inches for concrete removal and 4 inches for untreated base material. The depth of excavation at driveways would typically be 12 inches: 6 inches for concrete removal and 6 inches for untreated base material. Construction equipment for sidewalk repair may include standard tools: jackhammer for removing the sidewalk, a concrete truck for delivery, tamper rammer for soil/gravel compaction, and a skid steer and dump truck for existing concrete removal.

Curb Ramp Repairs

Curb ramp repairs may require a similar level of effort and equipment as sidewalk repair. A curb ramp typically takes 3–4 days for construction: 1 day for demolition; 1 day for grading and formwork; 1 day for construction; and 1 day for cleanup and restoring the parkway. Curb ramps could potentially have an impact on pedestrian traffic and may require temporary ramps. Temporary ramps would not damage existing pavement, curbs, or gutters near the proposed work.

Street Tree Removal and Replacement

For street tree removals, required equipment typically includes rigging equipment, rope, chainsaw and gear, saw wenches, wedges and clearing and cleaning tools. Street tree removal vehicles and grinders may be on site for 1–2 days, depending on the number of street trees being removed. The street would not be closed to vehicular traffic, but traffic flagpersons and/or devices would need to be placed during street tree removal in order to protect all vehicles from unforeseen falling debris. Bicycle lanes will likely be merged into traffic lanes if adequate lane width is available. If traffic lane width is not adequate then bicyclists would likely be routed to an adjacent street. Pedestrians would be rerouted to the other side of the street for the entire block in most cases.

For some street tree replacements, Underground Service Alert may be contacted prior to excavation to identify any existing utilities in the planting area. Depending on the location of the existing utilities and the number of plantings to be performed, equipment could include a back hoe, mini excavator, or shovel. A root barrier is recommended to be installed that is 18 inches deep and 10 feet long between the street tree and the sidewalk. The street tree is planted and stakes are typically installed and secured to the street tree. Decomposed granite is often placed in street tree wells and dirt is placed in parkways. New street trees are watered during a 3-year establishment period typically with a water truck.

Minor Utility Work

Minor utility relocations usually are restricted to the relocation of utility laterals that interfere with the construction of city sidewalks, like gas and water service laterals to businesses and homes. The utility relocation typically requires a trench up to 36 inches deep and require mini-excavators,

staging areas for excavated soils, and a tamper rammer for compacting soils. The utility relocation could take 3–4 days. When the concrete is being poured, cement trucks will generally occupy one lane in the ROW. The street will not be closed in most cases, but flagpersons and or devices may need to be placed on both sides of the cement truck in order to control traffic. Bicycle lanes will merge into traffic lanes if adequate lane width is available. If traffic lane width is not adequate then bicyclists will be routed to an adjacent street. Pedestrians could be rerouted to the other side of the street for the entire block. The utility relocation could require an approval from the utility owner that could take 3–6 months for a relocated lateral. As relocation could take several days, plates could be placed over the excavated areas. In addition, coordination would typically be required with the utility company for disconnecting, reconnecting, and recommissioning the new line. If an existing utility lid or cover is damaged or missing, it would be replaced. Coordination of the utility work may be required between the utility owner and construction work personnel.

Staging

Generally, construction staging would likely be placed on the parcel adjacent to the sidewalk improvements (when possible). This may impact adjacent sidewalk areas, and the street in front of the sidewalk improvement area. Traffic control would likely be needed to re-route pedestrians around the sidewalk construction area. A localized, mid-block crossing is not recommended because of the impact on traffic and pedestrian safety. Bicyclists and motor vehicles would either need to be routed away from the curb or to an adjacent block where a sidewalk exists. Private driveways may be closed for up to 1 day, and construction staging areas could occupy 3–4 parking spaces. All lane closures and construction activities adjacent to the ROW may require coordination with the Los Angeles Department of Transportation (LADOT), the Los Angeles Fire Department (LAFD), and the Los Angeles Police Department (LAPD).

Scenario 2: Sidewalk Repair with Curb Ramp Repairs, Crosswalk Repaving, Street Tree Removals and Replacements, and Major Utility Work

This scenario represents combinations of the following construction activities:

- Sidewalk repair work including fixing broken concrete, cracks, uplifts, driveways, curb and gutter, and making required accessibility improvements such as cross slope work.
- Curb ramp repairs or installations.
- Crosswalk Repaving.
- Street tree removals and replacements.
- Major underground and/or overhead utility relocation work.

Sidewalk Repair

Same as Scenario 1 with the potential addition of required coordination between subcontractors due to major utility work in this scenario.

Curb Ramp Repairs

Same as Scenario 1 with the potential addition of required coordination between subcontractors due to major utility work in this scenario.

Crosswalk Repaving

Crosswalk construction may include grinding, paving, and striping to alleviate existing shoving, cracks, or uplifts from curb ramp to curb ramp. Crosswalk construction generally is performed outside of peak travel times, which are typically the morning and afternoon commute period. Curb ramps leading to the crosswalk must be barricaded in a manner that walkways remain accessible. Equipment may include grinders, asphalt pavers, and striping machines.

Street Tree Removal and Replacement

Same as Scenario 1 with the potential addition of required coordination between subcontractors due to major utility work in this scenario.

Major Utility Work

Major utility relocation for overhead lines could be a possibility for a block, from intersection to intersection. This is relevant when overhead poles are placed on a sidewalk that restricts the path of travel to less than 4 feet in width. Depending on the amount of overhead lines on a utility, utility relocation of an overhead line for one parcel could take 1–2 weeks, while removal and replacement of several lines could take approximately 4–5 weeks. Utility relocations may require improvement plans from the utility owner for construction. These utility plans generally take 6–12 months of design work prior to acceptance and issuance from a dry utility company. Construction of the utility relocation may require a minimum of two trucks with bucket loaders for each pole installation, an auger for removal of soils for a new base, and a concrete truck for delivery of structural base concrete. This may require closing one lane of traffic, which could have the same traffic constraints as sidewalk construction. Coordination would be required with the utility company for disconnection and reconnection and recommissioning.

Depending on the type of utility being rerouted, additional trucks and equipment could possibly be required that will take up more space for construction staging and parking areas. Traffic signals may be affected, and coordination will be required with the authorizing agencies, including LADOT. Depending on the time of day and type of utility being relocated, temporary power may be required. For below ground utility relocation, 36- to 76-inch-deep trenching and shoring could be required in the relocation areas. The construction equipment may likely include mini-excavators, four-wheel drive backhoes, shoring equipment, and compactors, as well as a staging area to hold excavated soils. These utilities may require the same traffic control measures as overhead power lines. Plates would have to be placed over the trenching areas during non-working hours.

Catch Basin and Storm Drain Reconstruction

Catch basin and storm drain reconstruction may be necessary for ADA compliant sidewalk repairs. The reconstruction of these structures would require excavation and trenching to a minimum depth of 4–15 feet, depending on the elevation of the outflow pipes and whether full replacement of the structure is required. Additional trucks and equipment, such as excavators, backhoes, shoring equipment, compactors, and additional concrete trucks may be necessary, along with additional staging and parking areas. This work could require an additional 3 to 7 days for cast in place structures.

Staging

Same as Scenario 1 with the potential addition of required coordination between subcontractors due to major utility work in this scenario. As discussed, construction durations may be longer with the additional and more complex work related to this project construction scenario.

Location and Existing Conditions

Location

The City of Los Angeles, located within Los Angeles County, contains 467 square miles or 302,596 acres. Approximately 76 percent (230,337 acres) is developed and 24 percent (72,219 acres) is undeveloped. Land use within the City is primarily residential, as it constitutes 60 percent of all acreage within the City. Public land is the second most common land use, representing 20 percent of acreage within the City, while commercial and industrial land uses each represent 7 percent of acreage within the City.¹ Within these land uses, approximately 15 percent of all land in the City consists of streets.

The City is bordered by the cities of Calabasas, Hidden Hills, and Santa Monica and the Pacific Ocean to the west; the cities of Burbank, Glendale, Pasadena, and the Angeles National Forest to the north; the cities of South Pasadena, Alhambra, Commerce, Vernon, and South Gate to the east; and Compton, Carson, Gardena, Inglewood, Culver City, and El Segundo to the south. In addition, West Hollywood, Beverly Hills, and San Fernando are islands within the City of Los Angeles, and pockets of unincorporated Los Angeles County land lie within and adjacent to the City of Los Angeles.

Existing Conditions

To organize the environmental impact analysis within the proposed Project area, the City has been organized into seven regional project zones that overlap with the boundaries of existing Area Planning Commissions (APCs) within the City: North Valley, South Valley, West Los Angeles, Central Los Angeles, East Los Angeles, South Los Angeles, and Harbor. APCs are used by the City Planning Department to help determine significant planning and land use issues for proposed plans and projects. Details regarding the geographic project zones that correlate with the seven APCs within the City are summarized in Table 2. All data pertaining to each project zone APCs were obtained from the City's Department of City Planning website.²

The project zones range from approximately 33.9 to 126.8 square miles. The City is also divided into 15 Council Districts. In most cases, the project zones contain more than one Council District, and Council Districts are located in more than one project zone, as shown on Figure 3.

¹ Data from the City of Los Angeles website: <http://cityplanning.lacity.org/DRU/StdRpts/StdRptsCw/>

² <http://cityplanning.lacity.org/DRU/LocL/LocRpt.cfm?geo=AP&sgo=CP#>. Accessed: 12/27/2016.

Table 2. Project Zone Summary

Project Zone	Total Area (square miles)	Council Districts	Population	Housing Units
North Valley	126.8	2,3,6,7,12	707,390	203,971
South Valley	97.6	2,3,4,5,6, 12	758,815	288,505
West Los Angeles	90.0	4,5,11	431,348	194,409
Central Los Angeles	48.8	1, 4, 5, 9, 10, 13,14	733,525	291,297
East Los Angeles	37.6	1,4, 13,14	432,611	130,516
South Los Angeles	43.8	1, 8, 9, 10, 15	734,593	218,287
Harbor	33.9	15	205,218	67,000

Source: TAHA 2016

Project Zones

North Valley

The North Valley project zone is located in the northernmost portion of the City and covers approximately 127 square miles. It includes the following communities: Chatsworth-Porter Ranch, Northridge, Granada Hills-Knollwood, Mission Hills-Panorama City-North Hills, Sylmar, Arleta-Pacoima, Sun Valley-La Tuna Canyon, and Sunland-Tujunga-Shadow Hills-Lakeview Terrace-East La Tuna Canyon.

South Valley

The South Valley project zone is located south of the North Valley project zone and covers approximately 98 square miles. It includes the following communities: Canoga Park-West Hills-Winnetka-Woodland Hills, Reseda-West Van Nuys, Encino-Tarzana, Van Nuys-North Sherman Oaks, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass, and North Hollywood-Valley Village.

West Los Angeles

The West Los Angeles project zone is located in the western portion of the City, below the South Valley project zone, covers approximately 90 square miles, and falls within the California Coastal Zone. This project zone includes the following communities: Brentwood-Pacific Palisades, Bel Air-Beverly Crest, Westwood, West Los Angeles, Palms-Mar Vista, Venice, Del Rey, Westchester, Playa Del Rey, and the Los Angeles International Airport (LAX). Street tree removals and replacements in the California Coastal Zone would require approval from the California Coastal Commission and the City.

Central Los Angeles

The Central Los Angeles project zone is located in the central portion of the City and covers approximately 49 square miles. It includes the following communities: Hollywood, Wilshire, Westlake, Central City, and Central North.

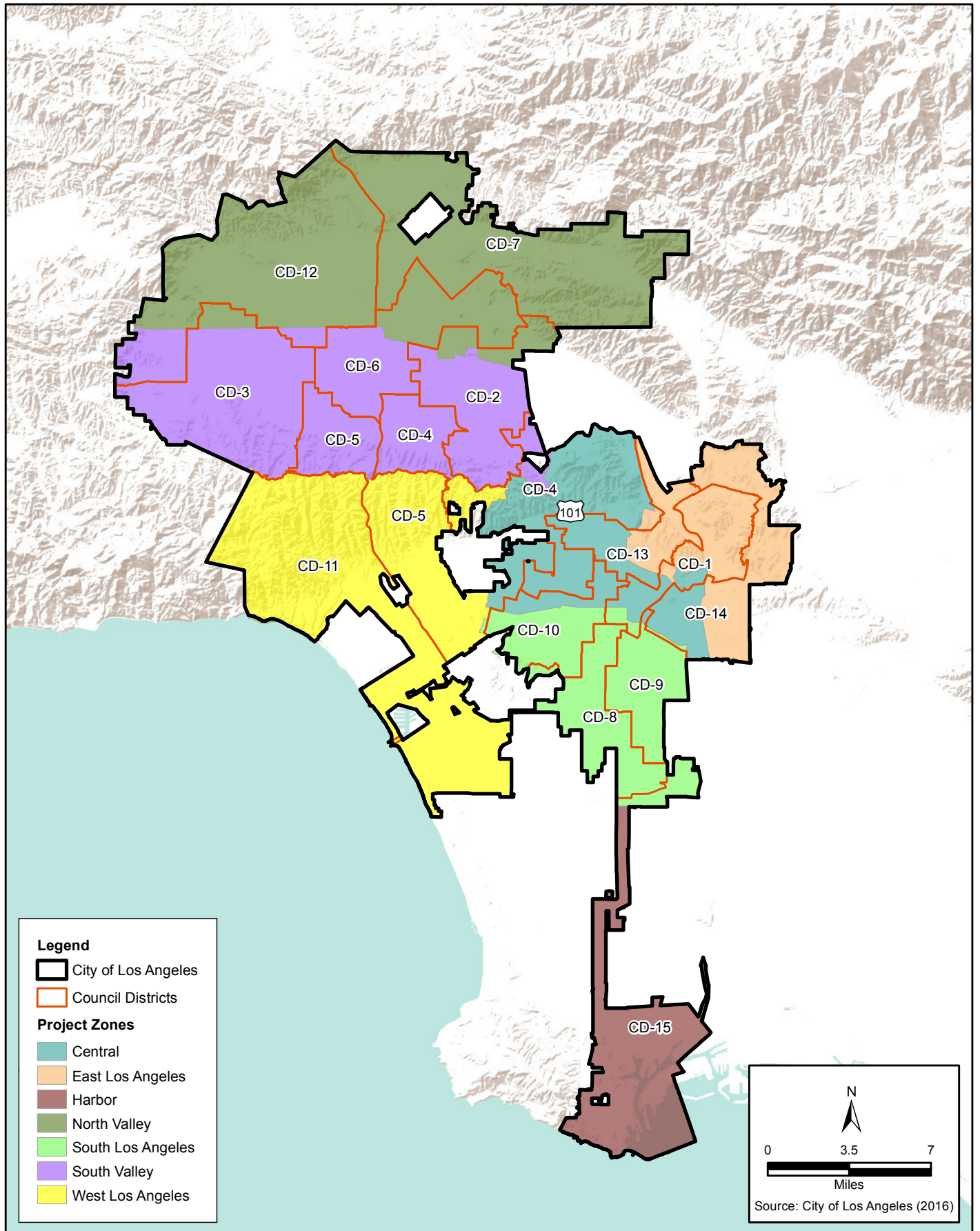


Figure 3
City of Los Angeles Council Districts
Sidewalk Repair Program

East Los Angeles

The East Los Angeles project zone is located east of the Central Los Angeles project zone and covers approximately 38 square miles. It includes the following communities: Silver Lake-Echo Park, Northeast Los Angeles, and Boyle Heights.

South Los Angeles

The South Los Angeles project zone is located south of the Central and East Los Angeles project zones. It covers approximately 44 square miles and includes the following communities: West Adams-Baldwin Hills-Leimert, South Los Angeles, and Southeast Los Angeles.

Harbor

The Harbor project zone is located in the southernmost portion of the City and covers approximately 34 square miles and also falls within the California Coastal Zone. It includes the following communities: Harbor-Gateway, Wilmington-Harbor City, San Pedro, and the Port of Los Angeles. Street tree removals and replacements in the California Coastal Zone would require approval from the California Coastal Commission and the City.

Built Historic Resources

Geographic Information System (GIS) databases of built historic resources are currently available from City sources (Cultural Affairs Department and Department of City Planning). The City has numerous Historic Preservation Overlay Zones (HPOZs), which are governed by certified Historic Resource Surveys and Historic Preservation Plans. HPOZs, commonly known as historic districts, require review of all proposed exterior alterations and additions to historic properties within designated districts. The South Valley project zone does not currently contain any HPOZs. Construction of the proposed Project in historic districts will be discussed further in the Draft EIR.

Permits and Approvals

Table 3 lists the permits and approvals that most likely will be required for the proposed Project. The need for these permits will be verified through agency correspondence during the CEQA process.

Table 3. Anticipated Permits and Approvals for the Sidewalk Repair Program

Agency	Permit/Approval	Issue
Local		
City of Los Angeles, City Council	CEQA document	Certification of the EIR. The EIR will analyze proposed Project activities and expected impacts over the next 30 years.
City of Los Angeles, City Council	Proposed ordinance and/or policy implementing Sidewalk Repair Program street tree criteria	If approved, the proposed ordinance and/or policy could establish criteria for street tree preservation, removal, and replacement where street trees are the cause of sidewalk damage.

Agency	Permit/Approval	Issue
City of Los Angeles, Department of Public Works Bureau of Engineering	Class A Permit	Allows for minor construction work in the public ROW.
City of Los Angeles, Department of Public Works Bureau of Engineering	Class B Permit	Allows for extensive improvements in the public ROW, including street widening and relocation of traffic signals.
City of Los Angeles, Department of Public Works Bureau of Street Services	Street Tree Removal Permit	Permits are needed for street tree removal and replacement and root pruning. This may change for the proposed Project if an ordinance or policy for Sidewalk Repair Program implementation related to street trees is approved.
City of Los Angeles, Department of Public Works Bureau of Engineering	Revocable Permit	Permit is needed for non-standard items (planters, pavers, sculptures, etc.) to remain in the public ROW.
Regional		
Los Angeles Regional Water Quality Control Board (RWQCB)	National Pollutant Discharge Elimination System (NPDES) Construction Stormwater Pollution Prevention Plan permit	Water quality and placement of discharges associated with dewatering activities; no permit required for discharges to sewer (general permit saves time with RWQCB).
State		
California Coastal Commission	Local, and potentially state, coastal development permits	For projects in the coastal zone, access, habitat disturbance, street tree removals, street tree plantings, utility relocations, parking, and traffic during construction could be issues.

Coordinating Plans

There are many existing City policies and plans that will guide implementation of the proposed Project. These include Mobility Plan 2035 (2016), an update to the General Plan's Transportation Element, which incorporates "Complete Streets" principles and lays the policy foundation for the safety and accessibility of pedestrians, cyclists, transit riders, and motorists when interacting with the City's streets. Another important city initiative is Vision Zero, established by Mayor Garcetti's Executive Directive No. 10 (2015), which seeks to reduce traffic fatalities and declares safety to be the number one priority in designing and building streets and sidewalks. The proposed Project would also address the goals of the City sustainability report (The pLAn), for infrastructure. These and other coordinating policies and plans will be discussed further in the EIR.

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Chapter 3

Initial Study Environmental Checklist

1. **Project Title:** Sidewalk Repair Program
2. **Lead Agency Name and Address:** City of Los Angeles, Department of Public Works, Bureau of Engineering
Environmental Management Group
1149 S. Broadway, Suite 600
Los Angeles, CA 90015
3. **Contact Person and Phone Number:** Shilpa Gupta, Environmental Supervisor I
Los Angeles Bureau of Engineering
213-485-4560
shilpa.gupta@lacity.org
4. **Project Location:** City of Los Angeles
5. **Project Sponsor's Name and Address:** City of Los Angeles, Department of Public Works, Bureau of Engineering
6. **General Plan Designation:** Various
7. **Zoning:** Various
8. **Description of Project:**
The proposed Project would include the repair of sidewalks and curbs and associated improvements, which could include street tree removal and replacement, curb ramp improvements, and utility relocations.
9. **Surrounding Land Uses and Setting:**
Various
10. **Other Public Agencies Whose Approval is Required:**
See Table 3.

Environmental Factors Potentially Affected

The environmental factors checked below would potentially be affected by this proposed Project (i.e., the proposed Project would involve at least one impact that is a "Potentially Significant Impact"), as indicated by the checklist on the following pages.

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

Determination

On the basis of this initial evaluation:

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

Signature

Date

Printed Name

For

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained if it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including offsite as well as onsite, cumulative as well as project-level; indirect as well as direct; and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is

substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.

4. “Negative Declaration: Less than Significant with Mitigation Incorporated” applies when the incorporation of mitigation measures has reduced an effect from a “Potentially Significant Impact” to a “Less-than-Significant Impact”. The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less-than-significant level.
5. Earlier analyses may be used if, pursuant to tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration [Section 15063(c)(3)(D)]. In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where earlier analyses are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less than Significant with Mitigation Incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, when appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to a less-than-significant level.

		Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
I. Aesthetics					
Would the project:					
a.	Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a scenic highway?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Would the project:

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

Reference: L.A. CEQA Thresholds Guide (Sections A.1 and A.2); City of Los Angeles General Plan & Community Plans.

Comment: A scenic vista generally provides focal views of objects, settings, or features of visual interest; or panoramic views of large geographic areas of scenic quality, primarily from a given vantage point. A significant impact may occur if the proposed Project either introduced incompatible visual elements within a public field of view containing a scenic vista or substantially altered a view of a scenic vista.

Potentially Significant Impact. The study area (City of Los Angeles) is mostly urbanized and contains a mixture of residential, public facilities, commercial, and industrial land uses (amongst others). The quality of and impacts on views and scenic vistas (unofficial and officially designated) throughout the City are highly dependent on the position, angle, and speed of the viewer (as well as their visual preferences), and their proximity to visual resources and/or other visual elements, such as street trees/vegetation, that enrich their viewshed or create visual interest. Therefore, and because the proposed Project could include street tree removal and replacement (street trees are often considered visual resources) and work in coastal zones and culturally sensitive areas, the potential visual impacts of the prototypical project types/construction scenarios within each project zone will be further analyzed in the EIR using a selection of key viewpoints. In addition, the proposed Project would include changing the permit process for street tree removal, which could include an ordinance and/or policy setting criteria for street tree replacement ratios or specifying species, size, or location of replacement street trees. This issue will be further analyzed in the EIR.

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

Reference: L.A. CEQA Thresholds Guide (Sections A.1 and A.2); City of Los Angeles General Plan & Community Plans; Venice Local Coastal Program; and California Department of Transportation (Caltrans), California Scenic Highway Mapping System website (http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm). Mobility Plan 2035 Appendix A Inventory of Designated Scenic Highways and Guidelines.

Comment: 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.

Potentially Significant Impact. No officially designated state scenic highways traverse the limits of the City. However, within the City, portions of the following roads are considered eligible state scenic highways (not officially designated) and/or historic parkways: US-101, CA-27, US/CA-110, I-210 and State Route (SR-) 1 (Pacific Coast Highway) (Caltrans 2011). In addition, Mobility Plan 2035 identifies designated scenic highways as well as guidelines for development. Because the proposed Project could include street tree removal and replacement (street trees are often considered visual resources) and work in culturally sensitive areas that may contain historic resources that have visual merit, the potential visual impacts of the various prototypical project types/construction scenarios within each project zone will be further analyzed in the EIR.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Reference: L.A. CEQA Thresholds Guide (Sections A.1 and A.2).

Comment: A significant impact may occur if the proposed Project introduced incompatible visual elements to the proposed Project sites or visual elements that would be incompatible with the character of the area surrounding the proposed Project sites.

Potentially Significant Impact. As previously discussed, land uses and topographical forms vary throughout the City. As a result, the visual character of the City varies greatly depending on the proximity to visual resources and/or other visual elements, such as street trees/vegetation, that enrich their viewshed or create visual interest. Therefore, and because the proposed Project could include street tree removal and replacement (street trees are often considered visual resources) and work in coastal zones and culturally sensitive areas that may have unique character or offer high-quality views, the potential visual impacts of the various prototypical project types/construction scenarios within each project zone will be further analyzed in the EIR using a selection of key viewpoints. In addition, the proposed Project would include changing the permit process for street tree removal, which could include an ordinance and/or policy setting criteria for street tree replacement ratios or specifying species, size, or location of replacement street trees. This issue will be further analyzed in the EIR.

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

Reference: L.A. CEQA Thresholds Guide (Section A.4).

Comment: 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.

Less-than-Significant Impact. While nighttime construction is not anticipated, there may be rare instances where some possibility of nighttime lighting at the construction sites would occur. In these cases, lighting would be directed downward, and spill light would be minimized to the greatest extent possible in accordance with Los Angeles Municipal Code requirements. Therefore, significant changes in ambient illumination levels as a result of the proposed Project sources during construction are not expected, and construction lighting would not be expected to be a nuisance to nearby residents and businesses. Furthermore, due to the limited duration of the construction period(s), any impacts of this nature would be considered temporary. Other than the occasional and temporary reflection potentially produced by construction vehicle windshields, no glare-producing surfaces would be present on the construction sites. Signage and screening around the construction sites may be made of low-gloss materials and would produce little to no glare.

Operational lighting would include limited security lighting/lamp posts associated with sidewalk repair, as necessary. However, any street light signals and/or poles associated with operation of the proposed Project would relocate or replace existing light sources. Therefore, the proposed Project would not introduce any substantial increases in light above and beyond ambient illumination levels that would result in spill-over effects onto light-sensitive land uses. Similarly, no substantial glare-producing materials would be used in the sidewalk repairs compared to existing conditions. Impacts under construction and operation of the proposed project would be less than significant and this issue will be further analyzed in the EIR.

II. Agricultural and Forestry Resources	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
<p>In determining whether impacts on 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 Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts on 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 the Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>b. Conflict with existing zoning for agricultural use or conflict with a Williamson Act contract?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>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))?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>d. Result in the loss of forest land or conversion of forest land to non-forest use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>e. Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?

Reference: California State Department of Conservation Farmland Mapping and Monitoring Program website (<http://www.conservation.ca.gov/dlrp/FMMP/Pages/Index.aspx>); City of Los Angeles General Plan Conservation Element; Zone Information & Map Access System (ZIMAS).

Comment: A significant impact may occur if the proposed Project were to result in the conversion of state-designated agricultural land from agricultural use to a non-agricultural use.

No Impact. According to the *Los Angeles County Important Farmland 2014* map prepared by the California Department of Conservation, the City does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the proposed Project would not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and no impact would occur. This issue will not be further discussed in the EIR.

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

Reference: California State Department of Conservation Farmland Mapping and Monitoring Program website (<http://www.conservation.ca.gov/dlrp/FMMP/Pages/Index.aspx>) and California State Department of Conservation Land Conservation Act (ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_12_13_WA.pdf); City of Los Angeles General Plan Conservation Element, ZIMAS.

Comment: 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 a non-agricultural use.

No Impact. According to the LA City Zone Information and Map Access System (ZIMAS), the City contains A1, A2, RA, and PF zones, all of which allow for agricultural uses. The proposed Project would repair curbs and sidewalks, to applicable accessibility requirements, and could remove and replace street trees and utilities in the public ROW. As such, proposed Project activities would take place on built sidewalks, curbs, and public ROWs to restore or improve these areas when compared to their original surface conditions. If Project activities occur adjacent to properties that are zoned A1, A2, RA, or PF, they would not conflict with the zoning, as they would not preclude agricultural uses on these properties. Any temporary construction-period impacts that would occur adjacent to zoned areas that allow agricultural use would not change the underlying zoning such that long-term use of the properties would be affected. Construction and operational activities would not result in the conversion of land zoned for agricultural use. No impact would occur, as the proposed Project would not conflict with zoning for agricultural use.

According to the *Los Angeles County Williamson Act FY 2015/2016* map prepared by the California Department of Conservation, the City does not contain land protected under Williamson Act contract, and no impact related to Williamson Act contracts would occur as a result of implementation of the proposed Project. This issue will not be further discussed in the EIR.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) or timberland (as defined in Public Resources Code Section 4526)?

References: City of Los Angeles General Plan Conservation Element

Comment: A significant impact may occur if the proposed Project were to conflict with an existing zoning classification of forest land or timberland, or cause rezoning of an area classified as forest land or timberland.

No Impact. According to the *City of Los Angeles General Plan Conservation Element* the City does not contain zoning for forest land or timber land. Angeles National Forest on the north and Santa Susana Mountains to the northwest are located outside the City's boundaries. Therefore, the proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland. No impact would occur. This issue will not be further discussed in the EIR.

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

References: City of Los Angeles General Plan Conservation Element

Comment: There are no designated forest land uses in the City of Los Angeles.

No Impact. There are no designated forest land uses in the City of Los Angeles; therefore, no loss of forest land to non-forest use would occur and there would be no impact. This issue will not be further discussed in the EIR.

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

Reference: City of Los Angeles General Plan Conservation Element

Comment: The proposed project would take place within existing urban areas within the public ROW.

No Impact. The proposed Project activities would take place on built sidewalks, curbs, and public ROWs, and would not involve the conversion of farmland to non-agricultural use. As discussed in II.b., if Project activities occur adjacent to properties that have farmland, Project activities would not conflict with the use, as they would not preclude agricultural uses or change the underlying zoning on these properties. There are no existing forest lands or forests as discussed in II.c. As such, no forest land would be converted to non-forest use as a result of Project implementation. No impacts related to the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use would occur as a result of Project implementation. This issue will not be further discussed in the EIR.

III. Air Quality	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
When available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Would the project:

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

Reference: L.A. CEQA Thresholds Guide (Sections B.1 and B.2); South Coast Air Quality Management District, Final 2012 Air Quality Management Plan, February 2013; City of Los Angeles General Plan.

Comment: A significant impact may occur if the proposed Project would conflict with or obstruct implementation of the applicable air quality plan.

Potentially Significant Impact. The proposed Project is located in the South Coast Air Basin (Basin), which is regulated by the South Coast Air Quality Management District (SCAQMD) under the Clean Air Act. During the construction period, criteria pollutant and toxic air contaminant (TAC) emissions would result from the use of construction equipment and the transport of workers and materials to and from the project sites. Once construction activities are complete, operation of the proposed Project would provide improved sidewalks that would not involve pollutant emissions. No permanent change to vehicle circulation is anticipated following the completion of construction activities, and, therefore, there would be no change in operational emissions from vehicles as a result of the proposed Project. Based on the emissions that would result from construction activities, the proposed Project could have a potentially significant impact related to conflicting with or obstructing implementation of an applicable air quality plan. This issue will be further analyzed in the EIR.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Reference: L.A. CEQA Thresholds Guide (Sections B.1 and B.2); South Coast Air Quality Management District, Final 2012 Air Quality Management Plan, February 2013, CEQA Air Quality Handbook, 1993.

Comment: A significant impact may occur if the proposed Project would violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Potentially Significant Impact. As stated above for III.a, the proposed Project would result in the emissions of criteria and TAC pollutants during the construction period. These emissions may exceed the regional or localized significance thresholds for criteria pollutants established in the SCAQMD *CEQA Air Quality Handbook*. Therefore, the proposed Project could violate air quality standards or contribute substantially to an existing or projected air quality violation, and impacts are considered potentially significant. This issue will be further analyzed in the EIR.

c) 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 (including releasing emissions that exceed quantitative thresholds for ozone precursors)?

Reference: L.A. CEQA Thresholds Guide (Sections B.1 and B.2); 2015 State Area Designation Maps (<http://www.arb.ca.gov/desig/adm/adm.htm>).

Comment: A significant impact would occur if the proposed Project's incremental air quality effects are considerable when viewed in connection with the effects of past, present, and reasonably foreseeable future projects.

Potentially Significant Impact. As discussed above in III.a and III.b, proposed Project-related construction activities would emit criteria pollutants (and precursor emissions) for which the Basin is not in attainment under the Clean Air Act. Therefore, the proposed Project could result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard (including emissions that exceed quantitative thresholds for ozone precursors), and, therefore, impacts may be potentially significant. This issue will be further analyzed in the EIR.

d) Expose sensitive receptors to substantial pollutant concentrations?

Reference: L.A. CEQA Thresholds Guide (Sections B.1, B.2, and B.3).

Comment: 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. Sensitive receptor locations include residences, board and care facilities, schools, playgrounds, hospitals, parks, childcare centers, and outdoor athletic facilities.

Potentially Significant Impact. Sensitive receptor locations close to the proposed Project sites include residential uses, schools, playgrounds, hospitals, parks, childcare centers, and outdoor athletic facilities that would be adjacent to sidewalk repair sites. Criteria pollutant and TAC emissions would occur during project construction, potentially exposing sensitive receptors to substantial pollutant concentrations. Therefore, the potential for the proposed Project to expose sensitive receptors to substantial pollutant concentrations and result in a potentially significant impact will be further analyzed in the EIR.

e) Create objectionable odors affecting a substantial number of people?

Reference: L.A. CEQA Thresholds Guide (Sections B.1 and B.2).

Comment: A significant impact would occur if the project created objectionable odors during construction or operation that would affect a substantial number of people.

Less-than-Significant Impact. According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment facilities, food processing plants, chemical plants, composting areas, refineries, landfills, dairies, and fiberglass molding facilities. The sidewalks that would be repaired under the proposed Project would be within the public ROW, and would not include any of the land uses associated with odor complaints. During the construction period, some limited odor may result from asphalt paving activities, which may be detectable by people immediately adjacent to work sites. However, asphalt paving would occur for a limited time period at each site, and the locations of paving activities would be distributed throughout the City such that impacts at any particular location would not be substantial. Furthermore, SCAQMD Rule 402 prohibits the discharge of air contaminants that cause nuisance or annoyance to the public, including odors. SCAQMD maintains both a toll-free phone line (1-800-CUT-SMOG) and a web-based platform (<http://www.aqmd.gov/contact/complaints>) for reporting complaints related to air quality, including odors. Given the limited duration and location of asphalt paving, mandatory compliance with SCAQMD Rule 402, and ability for the public to report complaints to SCAQMD, proposed Project-related construction activities would not create a significant level of objectionable odors affecting a substantial number of people. This issue will be further analyzed in the EIR.

IV. Biological Resources	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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?**

Reference: L.A. CEQA Thresholds Guide (Section C); City of Los Angeles General Plan.

Comment: 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.

Potentially Significant Impact. The proposed Project sites are located in a highly urbanized area. A query of the California Natural Diversity Database (CNDDDB) and California Native Plant Society (CNPS) databases conducted for the proposed Project sites and surrounding topographic quadrangles indicates that there are 14 plants and 20 listed animals that are either considered threatened and/or endangered under the Federal Endangered Species Act and/or California Endangered Species Act, and an additional 58 animal species considered California Species of Special Concern, that have been recorded and/or are known to occur within the areas queried.

The City contains over 80 communities and distinct neighborhoods. Many of these communities have local community plans and policies. The proposed Project may adversely affect specific species or habitats protected in these plans and policies.

While construction of the proposed Project would occur on paved, previously disturbed surfaces, the work would require the use of construction workers, materials, and machinery. These activities could result in adverse noise effects on sensitive species known to occur adjacent to the work areas. In addition, the proposed Project could remove or prune a large number of street trees with the potential to support nesting birds protected by the Migratory Bird Treaty Act (MBTA) and protected tree-roosting bat species.

Based upon the analysis above, the proposed Project could have a substantial adverse effect, either directly on nesting birds or roosting bats, or through noise impacts on species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS), and, therefore, could result in a significant impact. In addition, the proposed Project would include changing the permit process for street tree removal, which could include an ordinance and/or policy setting criteria for street tree replacement ratios or specifying species, size, or location of replacement street trees. These issues will be further analyzed in the EIR.

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

Reference: See IV.a above.

Comment: See IV.a above.

Potentially Significant Impact. The proposed Project sites are located in a highly urbanized area. Although the proposed Project sites do not contain sensitive plant communities, habitats, or species, there are adjacent areas designated as Environmentally Sensitive Habitat Areas (ESHA) by the County of Los Angeles, and some repairs may occur adjacent to riparian areas. Direct impacts on sensitive or riparian habitats could occur through sedimentation, erosion, or hazardous materials spills associated with repair work and which may enter adjacent riparian or sensitive habitat area. Implementation of standard construction best management practices (BMPs) may mitigate these effects. Street tree removal may also be inconsistent with ESHA regulations.

The City contains over 80 communities and distinct neighborhoods. Many of these communities have local community plans and policies. The proposed Project may adversely affect specific species or habitats protected in these plans and policies.

The proposed Project sites could be adjacent to, and may adversely affect, riparian habitat or sensitive natural communities identified in these local plans or policies.

Based upon the analysis above, the proposed Project could have a substantial adverse effect on a riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS and result in a significant impact. This issue will be further analyzed in the EIR.

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

Reference: L.A. CEQA Thresholds Guide (Section C); City of Los Angeles General Plan

Comment: A significant impact may occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed.

Less-than-Significant Impact. The proposed Project sites would be located in a highly urbanized area. Sidewalk repair may also occur adjacent to wetlands and waters of the United States and California, under the jurisdiction of the U.S. Army Corps of Engineers (USACE) and CDFW, respectively. However, the work activities would not involve direct removal, filling, or hydrological interruption to federally protected wetlands. Direct impacts on wetlands could occur through sedimentation, erosion, or hazardous materials spills associated with repair work and which may enter adjacent wetlands. However, implementation of standard construction BMPs would ensure that impacts would remain less than significant. This issue will be further analyzed in the EIR.

- 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?**

Reference: L.A. CEQA Thresholds Guide (Section C).

Comment: A significant impact may occur if the proposed Project interfered with or removed access to a migratory wildlife corridor or impeded the use of native wildlife nursery sites.

Potentially Significant Impact. A query of the CNDDDB and CNPS databases conducted for the proposed Project sites and surrounding topographic quadrangles indicates that there are several native bat species that may use street trees as day roosts and breeding sites (maternity colonies) and that have been recorded and/or are known to occur within the areas queried. The proposed Project could remove or prune a large number of street trees with the potential to support maternity colonies for native bat species. Street tree pruning or removal also has the potential to directly affect nesting native bird species. Repair activities in the vicinity of bat maternity colonies or nesting birds may also disrupt reproductive activities through noise and disturbance. Sidewalk repair activities would be restricted to paved surfaces and are unlikely to 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 for other species beyond tree roosting/breeding bats and tree-nesting birds, as described above.

Based upon the analysis above, the proposed Project could 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. Thus, there could be a significant impact. This issue will be further analyzed in the EIR.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Reference: L.A. CEQA Thresholds Guide (Section C); City of Los Angeles General Plan; Venice Community Plan; Venice Local Coastal Program.

Comment: A significant impact may occur if the proposed Project would result in a conflict with local regulations pertaining to biological resources.

Potentially Significant Impact. The proposed Project would include repair work in the California Coastal Zone, which includes the communities of Venice, Playa Del Rey, Pacific Palisades, and San Pedro. These areas are subject to coastal development permit conditions when tree removals are required. Currently, any street tree removals and replacements require approval from the California Coastal Commission, which meets once a month in various locations throughout the state. This process can be time consuming on a tree-by-tree basis. The City may develop a blanket permit within the California coastal zone whereby all street tree removals and replacements performed under the proposed Project and with specific types of sidewalk repairs would obtain approval. This option's feasibility is yet to be determined.

The City's Urban Forestry Division maintains a list of Significant Street Trees. The street trees may be of importance due to their size, species, appearance, growth habits, flowers, or a combination of these characteristics. The proposed Project could conflict with protections afforded to Significant Street Trees.

The City's Protected Tree Ordinance provides protections to specific Southern California native tree species measuring 4 inches or more in cumulative diameter, 4.5 feet above ground level at the base of the tree. The ordinance also affords protections to street trees officially designated as an historical monument or as part of a HPOZ. The proposed Project would be evaluated for consistency with the Protected Tree Ordinance.

Based upon the analysis above, the proposed Project could conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance and result in a potentially significant impact. In addition, the proposed Project would include changing the permit process for street tree removal, which could include an ordinance and/or policy setting criteria for street tree replacement ratios or specifying species, size, or location of replacement street trees. These issues will be further analyzed in the EIR.

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?

Reference: City of Los Angeles General Plan; L.A. CEQA Thresholds Guide (Section C); CDFW: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>.

Comment: A significant impact may occur if the proposed Project would be inconsistent with the provisions of the adopted local, regional, or state Habitat Conservation Plans (HCPs).

Potentially Significant Impact. As noted above in IV.a, some proposed Project sites may be adjacent to resources identified as ESHAs.

The Rancho Palos Verdes NCCP boundary is located within the southern portion of the proposed Project area, specifically within the San Pedro Community Plan Area. Due to the relatively noninvasive nature of the proposed Project activities, it is unlikely that the proposed Project would

conflict with the Rancho Palos Verdes NCCP. However, certain project prototypes/construction scenarios would require tree removal, utility relocation, new rights-of-way, or easements, and may or may not take place in biologically sensitive areas as identified in the Rancho Palos Verdes NCCP. No other NCCP/HCPs are identified within the proposed Project area.

Based upon the analysis above, the proposed Project could conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP and result in a significant impact. This issue will be further analyzed in the EIR.

V. Cultural Resources	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations Section 15064.5?

Reference: L.A. CEQA Thresholds Guide (Section D.3), California Register of Historical Resources.

Comment: A significant impact may result if the proposed Project caused a substantial adverse change to the significance of a historical resource.

Potentially Significant Impact. Sidewalks and California Register of Historical Resources-related landscape components have the potential to be associated features of a historic resource or a collection of historic resources in the City as determined under State CEQA Guidelines, Article 5, Section 15064.5(a). Because the proposed Project would consist of a comprehensive project that would be implemented on a case-by-case basis, there is the potential for sidewalk repair work to impact individual historical resources and contributing elements of HPOZs within the City. The City's Urban Forestry Division maintains a list of Significant Street Trees, which may be of importance due to their size, species, appearance, growth habits, flowers, or a combination of these characteristics. Impacts are potentially significant; therefore, this issue will be further analyzed in the EIR.

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

Reference: L.A. CEQA Thresholds Guide (Section D.3) and General Plan Framework (EIR Cultural Resources Chapter Figure CR-1)

Comment: Although there are no known archaeological resources in or directly adjacent to the proposed Project area, proposed construction and operation of the proposed Project could result in the exposure or destruction of as yet undiscovered archaeological resources.

Potentially Significant Impact. If any archaeological resources are encountered during construction, the damage to or destruction of the resource would be a potentially significant impact. This issue will be further analyzed in the EIR.

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

Reference: L.A. CEQA Thresholds Guide (Section D.1); Venice Community Plan; Standard Specification for Public Works Construction (“Greenbook”).

Comment: A significant impact may occur if grading or excavation activities associated with the proposed Project would disturb unique paleontological resources or unique geologic features.

Potentially Significant Impact. Sidewalk repairs in themselves are unlikely to impact paleontological resources; however, related ground-disturbing activities such as utility relocation, street tree removal and replacement, or building of retaining walls have the potential to expose and disturb unique paleontological resources or unique geologic features. For example, major utility relocation excavations can reach depths of 76 inches—more than 6 feet, which can result in excavation into older Pleistocene alluvium; or in hillslope areas, cutting for a retaining wall could take place within exposed fossil-bearing sedimentary bedrock. Because the proposed Project is a comprehensive project that would be implemented throughout the City on a case-by-case basis, there is the potential for sidewalk repair work to impact fossil-bearing sediments or to disturb previously disturbed resources. Although these scenarios are unlikely in most cases, the potential to impact paleontological resources would be considered. This issue will be further analyzed in the EIR.

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

Reference: L.A. CEQA Thresholds Guide (Section D.2); Standard Specification for Public Works Construction (“Greenbook”).

Comment: A significant impact may occur if grading or excavation activities associated with the proposed Project would disturb interred human remains. No known human remains are present on the proposed Project sites or within the immediate vicinity. However, ground disturbance related to development projects have, in the past, resulted in the inadvertent discovery of previously unrecorded human remains.

Potentially Significant Impact. Although not anticipated, human remains could be identified during site preparation and grading activities, which could result in a significant impact. This issue will be further analyzed in the EIR.

		Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
VI. Geology and Soils					
Would the project:					
a.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i.	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii.	Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii.	Seismically related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv.	Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 an on-or or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Would the project:

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

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Reference: L.A. CEQA Thresholds Guide (Section E.1) General Plan Framework EIR Table GS-1.

Comment: A significant impact is not expected even though proposed Project elements are located within a state-designated Alquist-Priolo Zone or other designated fault zone.

Less-than-Significant Impact. The proposed Project would repair curbs and sidewalks at various locations throughout the City. Los Angeles City contains ten faults with mapped surface tracks and four blind or buried thrust faults that could result in seismic activity in Los Angeles. Any exposure of construction personnel to earthquakes would be for a short duration. Standard construction safety protocols would be followed, clear access to ingress emergency purposes would be identified, and use of proper safety gear would be implemented. Furthermore, the proposed Project features would not include the construction of habitable structures, and all the improvements would be conducted under the purview of LADOT, the Los Angeles Department of Public Works (LADPW), the Los Angeles Department of Building and Safety (LADBS), and the Los Angeles Bureau of Street Lighting. The proposed Project would comply with all applicable Occupational Safety and Health Administration (OSHA) safety requirements for worker safety. Thus, impacts would be less than significant. This issue will be further analyzed in the EIR.

ii. Strong seismic ground shaking?

Reference: L.A. CEQA Thresholds Guide (Section E.1) General Plan Framework and EIR Table GS-1.

Comment: A significant impact is expected if proposed Project elements are located within an active seismic area.

Less-than-Significant Impact. Southern California is a seismically active region. The City is located in Seismic Zone 4, which is a designation used in the Uniform Building Code to denote the areas of the highest risk to earthquake ground motion (California Seismic Safety Commission 2005). Due to the nature of the proposed Project construction activities, the proposed Project would require construction personnel on site. However, exposure of construction personnel to strong seismic ground shaking is unlikely and, in the case of an earthquake, would be for a short duration. Furthermore, the proposed Project features would not include the construction of habitable structures, and all the improvements would adhere to LADOT, LADPW, LADBS, and Los Angeles Bureau of Street Lighting requirement standards. The proposed Project would comply with all applicable OSHA safety requirements for worker safety. Thus, impacts would be less than significant. This issue will be further analyzed in the EIR.

iii. Seismically related ground failure, including liquefaction?

Reference: L.A. CEQA Thresholds Guide (Section E.1); NavigateLA (<http://navigatea.lacity.org/navigatea>); General Plan Framework EIR Table GS-1.

Comment: A significant impact is not expected even if proposed elements are located within an area prone to liquefaction.

Less-than-Significant Impact. The possibility of liquefaction occurring is dependent upon the occurrence of a significant earthquake in the vicinity, sufficient groundwater to cause high pore pressures, grain size, plasticity, relative density, and confining pressures of the soils present at the site. Liquefaction usually occurs when the underlying groundwater table is less than 50 feet below ground surface. Proposed improvements would occur throughout the City, and, as such, it is possible that they could occur within an area prone to liquefaction.

Construction activities would require construction personnel to be on site on a limited basis. Any exposure of construction personnel to ground failure, including liquefaction, would be for a short duration. Furthermore, proposed Project features would not include the construction of habitable structures, and all improvements would be conducted under the purview of LADOT, LADPW, LADBS,

and Los Angeles Bureau of Street Lighting. The proposed Project would comply with all applicable OSHA safety requirements for worker safety. Thus, impacts would be less than significant. This issue will be further analyzed in the EIR.

iv. Landslides?

Reference: L.A. CEQA Thresholds Guide (Section E.1). General Plan Framework EIR Geology Section Map, GS-4.

Comment: A significant impact is not expected if proposed Project elements would be located within an area prone to landslides.

Less-than-Significant Impact. As a whole, the City has wide-ranging topography. Proposed improvements are set to occur throughout the City, and, as such, it is possible that they may occur in areas designated as prone to landslides. Landslides can occur wherever there is a sloped undeveloped area. This issue will be further analyzed in the EIR.

Construction activities would require construction personnel to be on site on a limited basis. Any exposure of construction personnel to landslides would be for a short duration. Furthermore, proposed Project features would not include the construction of habitable structures and all improvements would be conducted under the purview of LADOT, LADPW, LADBS, and the Los Angeles Bureau of Street Lighting. The proposed Project would comply with all applicable OSHA safety requirements for worker safety. Thus, impacts would be less than significant.

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

Reference: L.A. CEQA Thresholds Guide (Section E.1). General Plan Framework EIR Geology Section Map, GS-4.

Comment: A significant impact may occur if the proposed Project were to expose large areas of soil to the erosion effects of wind or water.

Less-than-Significant Impact. Construction activities would include street tree root pruning, street tree removal, street tree planting, sidewalk repaving, enlarging street tree wells, relocation of street signs and street lights, and construction of walls, as well as utility relocation. Thus, it is possible that construction activities—such as sidewalk, crosswalk, or curb excavation; street tree removal and replacement; and utility relocation, all of which would all involve excavation and exposure of soils—would expose soils to potential erosion. However, compliance with National Pollutant Discharge Elimination System (NPDES) requirements for soil stabilization and construction BMPs would ensure that any soil erosion would be minimal or nonexistent. Thus, impacts would be less than significant. This issue will be further analyzed in the EIR.

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?

Reference: L.A. CEQA Thresholds Guide (Section E.1).

Comment: A significant impact is not expected if proposed Project elements are located atop an unstable geologic unit or soil.

Less-than-Significant Impact. Proposed improvements would occur throughout the City, and, as such, it is possible that they could occur in unstable geologic or soil areas.

Construction activities would require construction personnel to be on site on a limited basis. Any exposure of construction personnel to unstable soils would be for a short duration. Furthermore, proposed Project features would not include the construction of habitable structures, and all improvements would be conducted under the purview of LADOT, LADPW, LADBS, and the Los Angeles Bureau of Street Lighting. The proposed Project would comply with all applicable OSHA safety requirements for worker safety. Thus, impacts would be less than significant. This issue will be further analyzed in the EIR.

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

Reference: CEQA Guidelines Appendix G (Section VI).

Comment: A significant impact is not expected if proposed Project elements would be located in areas of expansive soils.

No Impact. Expansive soils generally have a substantial amount of clay, which has a high shrink/swell potential with varying water content, and can compromise the integrity building foundations and other structures in certain circumstances. Because proposed Project improvements would occur throughout the City, it is possible that Project activities could occur in areas containing expansive soils. The proposed Project would not change the underlying presence of expansive soil and would not place new structures on expansive soils, and therefore the potential for impacts related to expansive soils would not change as a result of implementation of the proposed Project. All construction activities would be consistent with City standards, including the City's *Permit & Procedure Manual for Work in the Public Right-Of-Way*, which states that a specified base material may be required where expansive soil is present (Standard Specifications Appendix:1). No creation of substantial risks to life or property would occur as a result of Project implementation, and no impact would occur. This issue will not be further discussed in the EIR.

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?

Reference: CEQA Guidelines Appendix G (Section VI); General Plan Framework EIR Geology Section Map, GS-5; NPDES Construction Stormwater Pollution Prevention Plan permit.

Comment: The proposed Project would not feature the use of septic tanks or alternative wastewater disposal systems.

No Impact. The proposed Project would repair existing sidewalks and curbs and remove and replace street trees and utilities. The work would be on disturbed land and built land with sewers readily available. No septic tanks or alternative wastewater disposal systems would be used or required under the proposed Project. Compliance with NPDES requirements of Los Angeles Regional Water Quality Control Board may require onsite treatment for proper disposal of wastewater. Portable restrooms would be available for construction personnel, thus eliminating the need for septic tanks or other alternative wastewater disposal systems. Therefore, there would be no impact. This issue will not be further discussed in the EIR.

VII. Greenhouse Gas Emissions	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would the project:

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

Reference: SCAQMD (<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds>); and CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008.

Comment: There are currently no established quantitative thresholds of significance for GHG emissions on a local, state, or national basis that are applicable to the proposed Project. However, as the City is located within the South Coast Air Basin, the proposed Project is under the local jurisdiction of the SCAQMD. Currently, the SCAQMD has developed a recommended interim threshold for assessing the significance of potential GHG emissions that uses a tiered approach to determining significance. At this time, the interim GHG significance threshold applies only to stationary source/industrial projects for which the SCAQMD may be the lead agency or projects that require air quality permits from the SCAQMD. The preferred significance threshold for GHG emissions from industrial projects is <10,000 metric tons of carbon dioxide equivalent (CO₂e) per year, which includes construction emissions amortized over 30 years and then added to operational GHG emissions. The screening level for significance for residential/commercial projects is 3,000 metric tons of CO₂e per year, which also includes construction emissions amortized over 30 years and then added to operational GHG emissions to determine total project GHG emissions. SCAQMD staff is in the process of determining a final significance threshold for residential and commercial projects. In the absence of an adopted threshold by SCAQMD that is applicable to the proposed Project it is reasonable for the Lead Agency to consider other available thresholds that may be more appropriate to assess potential GHG impacts resulting from the proposed Project. Given that the proposed Project is not a land use development, does not have an operational component, and will only generate temporary construction-related emissions, the use of a screening threshold may be appropriate to determine whether the proposed Project would require further analysis and mitigation with regard to climate change. One of the available screening-level thresholds that can be considered for the proposed Project is the California Air Pollution Control Officers Association's (CAPCOA) recommended screening criteria of 900 metric tons (MT) per year of CO₂e, which is a conservative threshold that has also been referred to in SCAQMD's *Interim GHG Significance Threshold* document. This particular threshold as well as other available screening-level thresholds will be considered in consultation with the Lead Agency for the purpose of evaluating the Project's potential GHG impacts.

Potentially Significant Impact. The sidewalk improvements and street tree/vegetation replacements occurring under the proposed Project will generate GHG emissions from onsite construction equipment use, commute trips by construction workers, and travel to and from the proposed Project sites by haul/delivery trucks. In addition, although the proposed Project does not have an operational component that will generate direct GHG emissions, the tree and/or vegetation removal or trimming associated with the proposed Project would result in the release of GHG emissions. This is because trees and other vegetation act as both carbon sinks (defined as a natural environment that absorbs more CO₂ than it releases) and carbon sources. As a prominent GHG, CO₂ is absorbed from the atmosphere by vegetation, which then releases oxygen (photosynthesis) and retains the carbon. In this capacity vegetation acts as a carbon sink. Trees/vegetation also act as a carbon source when they die and decompose as the carbon that was stored in their biomass is re-released and reacts with the oxygen in the air to form CO₂. Thus, the removal and disposal of the existing street trees/vegetation in the City will emit CO₂ as the plant tissues decay over time. However, replacement of the removed street trees/vegetation with new ones under the proposed Project will provide continued uptake (sequestering) of CO₂ from the atmosphere. It should be noted that the sequestration capacity of vegetation is determined by the area available for vegetation and the types of vegetation installed. Additionally, different types of trees also sequester different amounts of CO₂. Consequently, the amount of carbon sequestration that will occur under the proposed Project may be different than that currently occurring under existing conditions. As part of the analysis for the proposed Project, the total sequestration capacity of the new street trees/vegetation and that of the existing street trees/vegetation will be calculated and compared against each other to determine the net change that would occur from Project implementation. Overall, because construction activities and alterations to street trees and vegetation would occur, the proposed Project could generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. The removal and replacement of street trees could also result in an overall reduced canopy within the City, which in turn can contribute to urban heat island effects within the Project study area. Thus, urban heat island issues will also be considered as these are related to the sidewalk surface material as well as the street tree canopy. Furthermore, the proposed Project will include changing the permit process for street tree removal, which could include an ordinance and/or policy setting criteria for street tree replacement ratios or specifying species, size, or location of replacement street trees. These issues will be further analyzed in the EIR.

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

Reference: California Air Resources Board, The California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32), 2006; City of Los Angeles, Green LA – An Action Plan to Lead the Nation in Fighting Global Warming, 2007; City of Los Angeles, Climate LA – Municipal Program Implementing the Green LA Climate Action Plan, 2008.

Comment: A significant impact may occur if the proposed Project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG.

Potentially Significant Impact. As discussed in VII.a, above, GHG emissions would occur as a result of proposed Project construction activities and street tree/vegetation removal. Implementation of the proposed Project could, therefore, result in potentially significant impacts by conflicting with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHG. This issue will be further analyzed in the EIR.

VIII. Hazards and Hazardous Materials	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan area or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. For a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Would the project:

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

Reference: L.A. CEQA Thresholds Guide (Sections F.1 and F.2)

Comment: A significant impact related to the routine transport, use, or disposal of hazardous materials under the proposed Project is not expected.

Less-than-Significant Impact. The proposed Project would provide repair and upgrades to sidewalks, pavement, curbs, and non-compliant slopes throughout the City. Construction activities associated with the proposed Project would include street tree root pruning, street tree canopy pruning, street tree removal, street tree planting, sidewalk repaving, enlarging street tree wells, relocation of street signs and street lights, construction of walls (under 3 feet), and replacement of utility covers. These activities would occur over the life of the proposed Project (approximately 30 years), during which time routine transport, use, and disposal of hazardous materials to complete these activities such as fuel, solvents, paints, and oils would occur. Such transport, use, and disposal must be compliant with applicable regulations such as the Resource Conservation and Recovery Act (RCRA), Department of Transportation (DOT) Hazardous Materials Regulations, Los Angeles County General Plan goals and policies, and other regulations. Although hazardous materials such as fuel, solvents, paints, and oils would be transported, used, and disposed of during each sidewalk improvement event, these materials are typically used in construction projects and would not represent the transport, use, and disposal of acutely hazardous materials. Furthermore, hazardous waste handled as a result of the proposed Project construction activities is expected to be handled, stored, and disposed of according to applicable regulations. Proposed Project implementation involves sidewalk improvements as described above, and, as such, operation of the proposed Project would not involve transport, use, storage, or disposal of hazardous materials.

Adherence to aforementioned requirements would ensure proper handling and usage of hazardous materials in order to safeguard life and property and would ensure that the transport, use, and disposal of hazardous materials would not create a significant hazard to the public or environment. Therefore, impacts would be less than significant. This issue will be further analyzed in the EIR.

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?

Reference: L.A. CEQA Thresholds Guide (Sections F.1 and F.2)

Comment: A significant impact may occur if proposed Project elements are located on sites with a history of hazardous material releases and, as a result, would potentially create a significant hazard to the public or the environment.

Potentially Significant Impact. Sidewalk improvements conducted under the proposed Project would occur throughout the City and on previously disturbed sites. As such, construction activities could occur on or near sites with a history of hazardous materials releases. Sites with a history of releases have the potential of exposing construction personnel and the surrounding environment to contaminated media and/or soils. This issue will be analyzed further in the EIR.

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

Reference: L.A. CEQA Thresholds Guide (Section F.2)

Comment: A significant impact may occur if proposed Project elements are located within 0.25 mile of an existing or proposed school site and handled acutely hazardous materials and/or released toxic emissions, thus posing a hazard.

Potentially Significant Impact. As detailed in Chapter 2, *Project Description*, sidewalk improvements conducted under the proposed Project would occur in numerous locations throughout the City. As such, it is very likely that construction activities could occur adjacent to schools. However, as described in VIII.a, hazardous materials used during construction activities would be used, stored, and disposed of in accordance with applicable federal, state, and local regulations. Furthermore, the small amounts of hazardous materials used during construction activities would be materials typically used in construction equipment and construction sites, and would not include materials classified as acutely hazardous.

Conversely, and as mentioned under VIII.b, it is likely that construction activities could occur near sites with a history of hazardous materials releases. Sites with a history of releases have the potential of exposing the surrounding environment to contaminated media and/or soils, including schools located within 0.25 mile of the proposed Project elements. This issue will be analyzed further in the EIR.

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

Reference: L.A. CEQA Thresholds Guide (Section F.2)

Comment: A significant impact may occur if proposed Project elements were located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would potentially create a significant hazard to the public or the environment.

Potentially Significant Impact. Sidewalk improvements conducted under the proposed Project would occur throughout the City. As such, it is very likely that construction activities could occur on or near sites listed in a hazardous materials database, including sites listed pursuant to Government Code Section 65962.5. Sites with a history of releases have the potential of exposing construction personnel and the surrounding environment to contaminated media and/or soils. This issue will be analyzed further in the EIR.

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

Reference: L.A. CEQA Thresholds Guide (Section F.1); City of Los Angeles General Plan.

Comment: A significant impact is not expected in terms of the proposed Project elements being located within a public airport land use plan area, or within 2 miles of a public airport.

Less-than-Significant Impact. Sidewalk improvements conducted under the proposed Project would occur throughout the City. As such, it is very likely that construction activities could occur in areas within an airport land use plan or within 2 miles of a public airport such as LAX. However, the

proposed Project involves improvement activities such as repair and upgrades to pre-existing sidewalks, pavement, and curbs and does not include structures or skyward features that would interfere with airport activities. Thus, improvements would result in circumstances similar to the existing conditions. Additionally, construction activities associated with sidewalk improvements would be temporary and occur outside airport footprints and, therefore, would not interfere with day-to-day airport operations. Based upon the analysis above, the proposed Project would not result in a safety hazard for people residing or working in locations within an airport land use plan or within 2 miles of a public airport. Therefore, impacts would be less than significant. This issue will be further analyzed in the EIR.

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

Reference: L.A. CEQA Thresholds Guide (Section F.1)

Comment: A significant impact is not expected in terms of proposed Project elements being located in the vicinity of a private airstrip.

Less-than-Significant Impact. The analysis under VIII.e also applies to private airstrips. Impacts would be less than significant. This issue will be further analyzed in the EIR.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Reference: L.A. CEQA Thresholds Guide (Section F.1)

Comment: Proposed Project elements are not expected to substantially interfere with roadway operations used in conjunction with an emergency response plan or evacuation plan, nor would they generate sufficient traffic to create traffic congestion that would interfere with the execution of such plans.

Less-than-Significant Impact. During construction, traffic may need to be routed around the construction area, and street parking may be temporarily limited in the area. However, traffic control measures, including traffic signs and traffic cones, would be required. Construction activities would occur in smaller areas and would not result in substantial traffic queuing along any major arterial. Moreover, the proposed Project would not include any characteristics (e.g., permanent road closures, long-term blocking of road access) that would physically impair or otherwise interfere with emergency response or evacuation in the vicinity. The proposed Project would also be required to comply with the City's Fire and Police Departments' emergency access requirements during construction. Based upon the analysis above, the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and, therefore, impacts would be less than significant. This issue will be further analyzed in the EIR.

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

Reference: L.A. CEQA Thresholds Guide (Section F.1).

Comment: A significant impact is not expected in terms of proposed Project elements being located in wildland areas or adjacent to wildland areas.

Less-than-Significant Impact. Sidewalk improvements conducted under the proposed Project would occur throughout the City. As such, it is possible that construction activities could occur in areas near wildlands. However, the proposed Project would involve improvement activities such as repair and upgrades to pre-existing sidewalks, pavement, and curbs, which would result in circumstances similar to the existing conditions and would not include structures meant for human occupancy. Additionally, construction personnel would be at any given location only for a brief amount of time resulting in a minimal exposure to potential wildfire risks. Based upon the analysis above, the proposed Project would not result in a significant risk of loss, injury or death involving wildland fires. Therefore, impacts would be less than significant. This issue will be further analyzed in the EIR.

IX. Hydrology and Water Quality	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge, resulting in a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
g. Place housing within a 100-year flood hazard area, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood hazard area structures that would impede or redirect floodflows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Would the project:

a) Violate any water quality standards or waste discharge requirements?

Reference: L.A. CEQA Thresholds Guide (Section G.2)

Comment: A significant impact may occur if the proposed Project discharged water that did not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems, such as the Los Angeles Regional Water Quality Control Board (RWQCB). These regulations include compliance with the NPDES requirements for Municipal Separate Storm Sewer System (MS4) and Construction General Permits (CGP) requirements to reduce potential water quality impacts.

Less-than-Significant with Mitigation Incorporated. The proposed Project would provide repair and upgrades to sidewalks, pavement, curbs, and non-compliant slopes throughout the City. Construction activities associated with the proposed Project would include street tree root pruning, street tree canopy pruning, street tree removal, street tree planting, sidewalk repaving, enlarging street tree wells, relocation of street signs and street lights, construction of walls (under 3 feet), and replacement of utility covers. During construction activities associated with existing sidewalk removal and excavation, activities could expose soil and temporarily increase the amount of suspended solids (sediment) in sheet flow or runoff into the existing storm drain system. In addition to potential pollutant contributions from exposed soil areas, the delivery, handling, and storage of construction materials and wastes, as well as the use of construction equipment, could introduce a risk for stormwater contamination that could affect water quality. Spills or leaks from heavy equipment and machinery can result in oil and grease contamination. Larger pollutants, such as trash, debris, and organic matter, are also associated with construction activities. Furthermore, concrete used for sidewalk repairs could be a potential source of water quality pollution if any of the material was spilled or deposited on unprotected surfaces. Thus, surface water quality could potentially be temporarily affected by construction activities. The proposed Project is anticipated to replace existing impervious surfaces with new impervious surfaces. However, the amount of impervious surfaces is not anticipated to increase over existing conditions.

The proposed Project collectively would repair over 1 acre of sidewalk throughout the City. However, each individual sidewalk repair section is likely to be less than one acre. In addition, it is anticipated that sidewalk repair would occur in smaller sections throughout the City. As such, the majority of the proposed Project would implement erosion and sediment control BMPs in accordance with the City's MS4 Permit (Order No. R4-2012-0175) for areas under 1 acre. The MS4 Permit includes construction requirements for implementation of minimum construction site BMPs for erosion, sediment, non-stormwater management, and waste management on all construction sites under 1 acre. For any portion of the proposed Project replacing over 1 acre of sidewalk, the proposed Project would be required to comply with the CGP through the State Water Resources Control Board. The CGP and associated NPDES requirements include development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) with associated monitoring and reporting. Stormwater BMPs are required to control erosion, minimize sedimentation, and control stormwater runoff water quality during construction activities. Additional source control BMPs would also be required to prevent contamination of runoff by potentially hazardous materials and eliminate non-stormwater discharges.

Compliance with the minimum construction site BMP requirements in the MS4 Permit or CGP SWPPP that require construction phase BMPs would ensure that construction activities would not degrade the surface water quality of receiving waters to levels below standards considered acceptable by the Los Angeles RWQCB or other regulatory agencies or impair the beneficial uses of the receiving waters. Construction would not result in a violation of any water quality standards or waste discharge requirements, would not provide substantial additional sources of polluted runoff, and would not substantially degrade water quality.

Because the proposed Project would be constructed adjacent to storm drains, the potential exists for construction-phase impacts related to disruption of sediments and sediment-bound pollutants. Although the proposed Project could violate water quality standards or waste discharge requirements, standard regulatory compliance measures and, if necessary, mitigation measures could be implemented to reduce impacts. Therefore, impacts associated with construction would be less than significant with mitigation incorporated. This issue will be further analyzed in the EIR.

Because the proposed Project is considered a maintenance project that is replacing existing sidewalk with new sidewalk (original purpose of facility), MS4 Permit redevelopment requirements do not apply. As a result, no post-construction BMPs or hydromodification requirements are anticipated.

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

Reference: L.A. CEQA Thresholds Guide (Sections G.2 and G.3)

Comment: 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.

No Impact. The existing locations of the proposed Project (sidewalks) are not areas that are used for recharge purposes. Aside from the minor amounts of water used for landscaping for the street trees, the proposed Project would not pump groundwater from the aquifer. Groundwater impacts within the project limits would be less than significant because the proposed Project entails repairing and improving existing sidewalks within the City, an existing urbanized area with impervious surfaces. In addition, the proposed Project would not require the construction of a groundwater well or the use of groundwater supplies, and would not interfere with recharge of a local aquifer. The proposed Project sites are within an established urban community serviced by the Los Angeles Department of Water and Power, the proposed Project does not propose to pump groundwater, and no groundwater dewatering is anticipated. Water needed for the proposed Project would be associated with construction activities and would be obtained from available public or private sources (e.g., water trucks). However, the proposed Project would include street tree removal and street tree planting. The City is responsible for watering and maintaining all street trees for 3 years. Routine watering would increase the amount of water used from current conditions. The street trees located within the sidewalk do provide a permeable area for water to infiltrate into the ground, albeit minor. While these areas can infiltrate water, they do not contribute significantly to groundwater recharge. Further, street trees would be replanted in its place. As such, no impacts on the local aquifer would occur. This issue will not be further discussed in the EIR.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on or off site?

Reference: L.A. CEQA Thresholds Guide (Sections G.1 and G2)

Comment: A significant impact may occur if the proposed Project resulted in a substantial alteration of drainage patterns that caused a substantial increase in erosion or siltation during construction or operation.

Less-than-Significant Impact. Implementation of the proposed Project would not substantially affect the existing drainage pattern of the proposed Project sites. No component of the proposed Project would result in substantial alteration of the existing drainage pattern of the sites. The proposed Project would comply with all applicable BOE and City standards for maintaining slopes with regards to drainage and slopes. The proposed Project sites are currently developed as sidewalks within the City. The City is an urbanized community consisting of pervious and impervious surfaces that would be reconstructed or repaired. The rate and amount of surface runoff is determined by multiple factors, including topography, the amount and intensity of precipitation, the amount of evaporation that occurs in the watershed, and the amount of precipitation and water that infiltrates to the ground. According to the Western Regional Climate Center, average annual rainfall in Los Angeles totals approximately 15 inches, with the highest monthly averages occurring in January and February (about 3 inches per month) (Western Regional Climate Center 2017). No increase in impervious surfaces is anticipated for sidewalk repairs, and, therefore, the proposed Project would not have the potential to result in an increase in erosion potential of downstream receiving water bodies during a rain event compared to existing conditions. Sidewalk repairs and other construction activities would not substantially alter the existing drainage pattern of the sites or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off site. As such, impacts are anticipated to be less than significant. This issue will be further analyzed in the EIR.

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

Reference: L.A. CEQA Thresholds Guide (Sections G.1)

Comment: A significant impact may occur if the proposed Project resulted in increased runoff volumes during construction or operation that would cause flooding conditions affecting the proposed Project sites or nearby properties.

Potentially Significant Impact. See IX.c. with respect to impacts from construction activities and operation of the proposed Project. Nevertheless, it is possible that removal of street tree canopy, if substantial in a particular location, could affect flooding conditions on the street and result in a faster-than-existing volume of runoff into the storm drain system. This issue will be analyzed further in the EIR. As such, the proposed Project could substantially alter the existing drainage pattern of a site or substantially increase the rate or amount of surface runoff in a manner that would result in substantial erosion, siltation, or flooding on or off site. This issue will be further analyzed in the EIR.

e) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Reference: L.A. CEQA Thresholds Guide (Section G.2)

Comment: A significant impact may occur if the volume of runoff were to increase to a level that 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.

Less-than-Significant Impact. See the discussion under IX.a and IX.c. While the capacities of the conveyance facilities serving the proposed Project sites are unknown, the proposed Project may result in impervious surfaces that could increase stormwater runoff into the drainage system or provide substantial additional sources of polluted runoff. Standard BMPs and NPDES requirements would reduce impacts to less than significant. This issue will be further analyzed in the EIR.

f) Otherwise substantially degrade water quality?

Reference: Refer to IX.a above.

Comment: Refer to IX.a above.

Less-than-Significant Impact. See discussion under IX.a. The proposed Project would comply with all requirements related to water quality and would not otherwise substantially degrade water quality. Impacts would be less than significant. This issue will be further analyzed in the EIR.

g) Place housing within a 100-year flood hazard area, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

Reference: L.A. CEQA Thresholds Guide (Sections G.1 to G.3); City of Los Angeles General Plan Safety Element.

Comment: A significant impact may occur if the proposed Project were to place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.

No Impact. The Safety Element of the City's General Plan indicates that several portions of the proposed Project area are located within a 100-year flood plain. However, the proposed Project would not include the construction of housing, and, therefore, no impacts would occur. This issue will not be further discussed in the EIR.

h) Place within a 100-year flood hazard area structures that would impede or redirect floodflows?

Reference: L.A. CEQA Thresholds Guide (Sections G.1 and G.3); City of Los Angeles General Plan Safety Element.

Comment: A significant impact may occur if the proposed Project were to place within a 100-year flood hazard area structures that would impede or redirect floodflows.

Less-than-Significant Impact. As noted in IX.g, several portions of the proposed Project sites are located within a 100-year flood plain. Pursuant to the recent California Supreme Court decision in *California Building Industry Association v. Bay Area Air Quality Management District*, CEQA does not require an analysis of how the existing environmental conditions will affect a project's residents or

users unless the project would exacerbate those conditions. Therefore, when discussing impacts of the environment on the proposed Project, such as placing structures within a 100-year flood hazard area that would impede or redirect floodflows, the analysis will first determine if there is a potential for the proposed Project to exacerbate the issue. If evidence indicates it would not, then the analysis will conclude by stating such. If it would potentially exacerbate the issue, then evidence is provided to determine if the exacerbation would or would not be significant. The proposed Project would not impede or redirect floodflows and, as such, would result in a less-than-significant impact. This issue will be further analyzed in the EIR.

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

Reference: L.A. CEQA Thresholds Guide (Sections E.1 and G.3); City of Los Angeles General Plan, Safety Element.

Comment: A significant impact may occur if the proposed Project were located in an area where a dam or levee could fail, exposing people or structures to significant risk of loss, injury or death.

No Impact. Pursuant to the recent Supreme Court case decision in *California Building Industry Association v. Bay Area Air Quality Management District*, CEQA does not require an analysis of how the existing environmental conditions will affect a project's residents or users unless the project would exacerbate those conditions. Therefore, when discussing impacts of the environment on the proposed Project, such as placing structures within a levee or dam inundation area that would impede or redirect floodflows, the analysis will first determine if there is a potential for the proposed Project to exacerbate the issue. If evidence indicates it would not, then the analysis will conclude by stating such. If it would potentially exacerbate the issue, then evidence is provided to determine if the exacerbation would or would not be significant. Several portions of the proposed Project are located in a levee or dam inundation area. However, the proposed Project is repairing existing sidewalks and curbs located throughout the City and would not expose people or structures to significant risks involving flooding, including flooding as a result of the failure of a levee or dam. No impact would occur. This issue will not be further discussed in the EIR.

j) Contribute to inundation by seiche, tsunami, or mudflow?

Reference: LA CEQA Thresholds Guide (Section E.1); City of Los Angeles General Plan Safety Element; and California Department of Conservation (<http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps>)

Comment: A significant impact may occur if the proposed Project would cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

No Impact. Portions of the proposed Project area are located adjacent to the Pacific Ocean. A review of the California Department of Conservation's tsunami regulatory maps and the City's Safety Element indicates that portions of the proposed Project sites are located within a Tsunami Hazard Zone. In addition, the proposed Project is located adjacent to several dams, reservoirs, and large bodies of water (e.g., Baldwin Hills Dam and Van Norman Dam) that may be subject to a seiche. Additionally, there are hillside slopes that could be at risk for mudflow. Pursuant to the recent Supreme Court case decision in *California Building Industry Association v. Bay Area Air Quality Management District*, CEQA does not require an analysis of how the existing environmental conditions will affect a project's residents or users unless the project would exacerbate those

conditions. The proposed Project is repairing existing sidewalks and curbs located throughout the City. The repair and replacement of existing sidewalks would not exacerbate inundation by seiche, tsunami, or mudflow. The proposed Project would not result in a greater risk than currently exists. As such, no impacts would occur. This issue will not be further discussed in the EIR.

	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
X. Land Use and Planning				
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would the project:

a) Physically divide an established community?

Reference: LA CEQA Thresholds Guide (Section H.2); City of Los Angeles General Plan and Municipal Code; Community Plans.

Comment: A significant impact would occur if the project includes 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 an established community.

Less-than-Significant Impact. The proposed Project would include repairs and upgrades to sidewalks, pavement, curbs, and slopes that are not compliant with applicable accessibility requirements throughout the City. As such, proposed Project activities would take place on previously disturbed, urban areas and would result in a minor alteration of land that would restore or improve disturbed areas when compared to their original surface conditions. Under all prototypical project types/construction scenarios, the proposed Project would not include highway work, substantial above-ground infrastructure, or easements that would cause a permanent disruption to an established community or would otherwise create a physical barrier within an established community. Therefore, the proposed Project would not physically divide an established community, and impacts would be less than significant. This issue will be further analyzed in the EIR.

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

Reference: LA CEQA Thresholds Guide (Sections H.1 and H.2); City of Los Angeles General Plan; ZIMAS.

Comment: 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 environmental impact.

Potentially Significant Impact. The proposed Project would occur at various locations throughout the City, governed by its General Plan's Land Use Element, which is made up of 35 distinct community plans. Due to the relatively noninvasive nature of the proposed Project activities, it is unlikely that the proposed Project would conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the proposed Project adopted for the purpose of avoiding or mitigating an environmental effect. However, certain project prototypes/construction scenarios would require tree removal and replacement, utility relocation, new rights-of-way or easements, and may or may not take place in culturally sensitive areas/HPOZs and/or Coastal Zones. Though specific requirements associated with street tree removals would be identified separately, and replacement would occur consistent with the City's replacement ratios, due to the variety of potential land use considerations, land use consistency evaluations should be made on a more thorough case-by-case basis, considering the location of repair work and governing policies at each location (i.e., examinations of land use policies in existing Area Planning Commission areas, relative to each prototypical project types/construction scenarios), to the extent practicable. In addition, the proposed Project would include changing the permit process for street tree removal, which could include an ordinance and/or policy setting criteria for street tree replacement ratios or specifying species, size, or location of replacement street trees. This issue will be further analyzed in the EIR.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

Reference: LA CEQA Thresholds Guide (Sections H.1 and H.2); City of Los Angeles General Plan; Los Angeles County Draft General Plan; Rancho Palos Verdes NCCP/HCP (<https://www.wildlife.ca.gov/Conservation/Planning/NCCP/Plans/Rancho-Palos-Verdes>).

Comment: A significant impact may occur if the proposed Project were located within an area governed by an HCP or NCCP and would conflict with such plan.

Potentially Significant Impact. The Rancho Palos Verdes NCCP boundary is located within the southern portion of the proposed Project area, specifically within the San Pedro Community Plan Area. Due to the relatively noninvasive nature of the proposed Project activities, it is unlikely that the proposed Project would conflict with the Rancho Palos Verdes NCCP. However, certain project prototypes/construction scenarios would require tree removal and replacement, utility relocation, new rights-of-way, or easements, and may or may not take place in biologically sensitive areas as identified in the Rancho Palos Verdes NCCP. No other NCCP/HCPs are identified within the proposed Project area. Therefore, a potentially significant impact could result under all prototypical project types/construction scenarios, and this issue will be further analyzed in the EIR.

XI. Mineral Resources	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?

Reference: L.A. CEQA Thresholds Guide (Section E.4); City of Los Angeles General Plan Conservation Element; California Division of Oil, Gas, and Geothermal Resources (<http://maps.conservation.ca.gov/doggr/#close>); City of Los Angeles 2001: Exhibit A.

Comment: A significant impact may occur if the proposed Project is in an area used or available for extraction of a regionally important mineral resource, if the proposed Project converts a regionally important mineral extraction use to another use, or if the proposed Project affects access to such use.

No Impact. As described in the Conservation Element of the City of Los Angeles General Plan, the California State Geologist classifies areas in which sand, gravel, and oil deposits can be found. The Conservation Element identifies the locations of Mineral Resource Zones (MRZ). MRZ-2 mineral resource zones are areas where sand and gravel extraction has occurred historically, which are in the eastern portion of the San Fernando Valley and around downtown Los Angeles. State-designated oil fields have been identified in the northern portion of the San Fernando Valley, the Mid-City area, near Playa del Rey, and to the north of San Pedro. Because the proposed Project would repair existing sidewalks and curbs and these areas are developed and not used for mineral resource extraction at present, the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. No impact would occur. This issue will not be further discussed in the EIR.

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?

Reference: Refer to XI.a above.

Comment: Refer to XI.a above.

No Impact. As discussed in XI.a. and the Conservation Element of the City of Los Angeles General Plan, the locations of surface and subsurface mineral resource deposits have been identified in several parts of the City of Los Angeles. The proposed Project would repair existing sidewalks within public rights of way. Because these sidewalks are developed, they are not used as locally-important mineral resource recovery sites at present. Therefore, no impact would occur. This issue will not be discussed further in the EIR.

XII. Noise	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Expose persons to or generate noise levels in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Expose persons to or generate excessive ground-borne vibration or ground-borne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Be located within an airport land use plan area, or, where such a plan has not been adopted, within two miles of a public airport or public use airport and expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Be located in the vicinity of a private airstrip and expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Would the project:

a) Expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Reference: City of Los Angeles Municipal Code (Chapter IV, Article 1, Section 41.40; Chapter XI).

Comment: A significant impact may occur if the proposed Project were to expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Potentially Significant Impact. Construction activity would involve the use of various noise-generating construction equipment. Even the simplest proposed Project element would likely involve equipment such as a jackhammer, concrete truck, tamper, skid steer, dump truck, stump grinder, and/or reciprocating saw. More complex repairs and street tree removals could require additional equipment such as a chainsaw, bucket loaders, an auger, mini-excavators, backhoes, shoring equipment, and compactor. These types of equipment typically generate maximum noise levels in the range of 76–89 A-weighted decibels (dBA) at a distance of 50 feet. Repair times could range from 2–3 weeks for an entire block with standard nine-man crew, to more than 5 weeks for more complex repairs (such as those involving major utility relocation work). Proposed Project

construction would occur throughout the City, including in residential neighborhoods and adjacent to other potentially noise-sensitive land uses. Based on the high noise levels generated by the proposed construction equipment, coupled with the proximity of sidewalks to the neighboring land uses, the proposed Project could result in exposure of persons to or generation of noise levels in excess of standards established in the general plan or noise ordinance, or applicable standards of other agencies, and, as such, impacts could be potentially significant. This issue will be further analyzed in the EIR. It is possible that some of the construction activity would not be subject to City noise standards based upon exemptions or variances within the code; the applicability of any such exemptions or variances will be investigated further in the EIR.

The proposed Project is not anticipated to generate any significant noise impacts after construction is complete, both because sidewalks are generally passive land uses, and because the new sidewalks would be direct replacements and improvements of the existing sidewalks.

b) Expose persons to or generate excessive ground-borne vibration or ground-borne noise levels?

Reference: L.A. CEQA Thresholds Guide (Section I); City of Los Angeles General Plan; City of Los Angeles Municipal Code.

Comment: A significant impact may occur if the proposed Project were to expose persons to or generate excessive ground-borne vibration or ground-borne noise levels.

Potentially Significant Impact. The proposed Project is not anticipated to use high-impact construction methods such as pile-driving or blasting. Nonetheless, construction equipment such as jackhammers, loaded trucks, augers, heavy earthmoving equipment (excavators, backhoes, etc.), and compactors have the potential to generate perceptible ground-borne vibration at nearby locations. Based on the likely proximity of proposed Project construction activity to homes or other sensitive buildings, the proposed Project could result in exposure of persons to excessive ground-borne vibration or ground-borne noise levels from construction activities, and, as such, impacts could be significant. This issue will be further analyzed in the EIR.

Because there are no operational elements of the proposed Project that would be sources of perceptible vibration, the proposed Project would not generate any ground-borne vibration impacts after construction is complete.

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

Reference: L.A. CEQA Thresholds Guide (Section I).

Comment: A significant impact may occur if the proposed Project were to substantially and permanently increase the ambient noise levels in the proposed Project vicinity above levels existing without the proposed Project.

No Impact. The primary noise source associated with the proposed Project would be construction activity, which would be temporary and not permanent. The proposed Project consists of an infrastructure project and would not introduce population into the City. As noted under VII.a, sidewalks are generally passive land uses that would not generate significant noise levels. Any changes to the sidewalks that would occur as a result of the proposed Project would not change the ambient noise environment in the surrounding community. As a result, the proposed Project would have no impact. This issue will not be discussed in the EIR.

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

Reference: L.A. CEQA Thresholds Guide (Section I); City of Los Angeles Municipal Code.

Comment: A significant impact may occur if the proposed Project were to create a substantial increase in the ambient noise levels on a temporary or periodic basis.

Potentially Significant Impact. The only temporary or periodic noise source associated with the proposed Project would be construction activity. As described in VII.a, construction equipment generates typical maximum noise levels in the range of 76–89 dBA at a distance of 50 feet. Such noise levels have the potential to significantly increase ambient noise levels at nearby noise-sensitive receptors on a temporary or periodic basis, and, as such, impacts could be significant. This issue will be further analyzed in the EIR.

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

Reference: None.

Comment: A significant impact may occur if the proposed Project would expose people residing or working in the proposed Project area to excessive noise levels due to the proposed Project sites being located within an airport land use plan or within 2 miles of a public airport where such a plan has not been adopted.

Less-than-Significant Impact. The proposed Project would occur at various locations throughout the City, and it is likely that at least some of these locations will be close to one of the region's airports, such as LAX. Specifically, construction activities could occur near airports. However, the proposed Project would not build any permanent structures or directly lead to any new people residing in the proposed Project area. Construction workers working in the vicinity of an airport would use ear protection in compliance with applicable OSHA regulations, which would reduce the exposure to airport noise to less than significant. Furthermore, the proposed Project would not affect airport flight operations or change the associated noise levels. This would be considered a less-than-significant impact. This issue will be further analyzed in the EIR.

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

Reference: None.

Comment: A significant impact may occur if the proposed Project would expose people residing or working in the proposed Project area to excessive noise levels in the vicinity of a private airstrip.

Less-than-Significant Impact. The proposed Project would occur at various locations throughout the City, and some of these locations may be close to a private airstrip. However, the proposed Project would not build any permanent structures or directly lead to any new people residing in the proposed Project area. Construction workers working in the vicinity of an airstrip would use ear protection in compliance with applicable OSHA regulations, which would reduce the exposure to airstrip noise to less than significant. Furthermore, the proposed Project would not affect airstrip flight operations or change the associated noise levels. This would be considered a less-than-significant impact. This issue will be further analyzed in the EIR.

XIII. Population and Housing	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace substantial numbers of existing housing units, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Would the project:

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

Reference: L.A. CEQA Thresholds Guide (Section J.1); Willits v. City of Los Angeles Settlement Term Sheet.

Comment: A significant impact may occur if the proposed Project induced substantial population and housing growth through new development in undeveloped areas or by introducing unplanned infrastructure that was not previously evaluated in the adopted community plan or general plan.

No Impact. The proposed Project would not include housing or commercial development. In addition, proposed Project construction would not indirectly induce growth in the area because the proposed Project would not include the extension of roads or other infrastructure. The proposed Project would provide repairs to curbs and sidewalks to comply with the applicable accessibility requirements and remove and replace street trees and utilities throughout the City. As such, proposed Project activities would take place on previously disturbed, urban areas and would result in a minor alteration of land that would restore or improve disturbed areas when compared to their original surface conditions. Because of the highly specialized nature of most construction projects, workers are likely to be employed on the job site only for as long as their skills are needed to complete a particular phase of the construction process. For that reason, it is reasonable to assume that most construction workers would not relocate their households to work on the proposed Project. Therefore, the proposed Project would not induce substantial population growth either directly or indirectly, and there would be no impacts. This issue will not be further discussed in the EIR.

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

Reference: L.A. CEQA Thresholds Guide (Sections J.1 and J.2); Willits v. City of Los Angeles Settlement Term Sheet.

Comment: A significant impact may occur if the proposed Project displaced substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.

No Impact. The proposed Project would not displace existing housing and would not necessitate the construction of housing elsewhere because this is an infrastructure project. The proposed Project would not include housing or commercial development. In addition, proposed Project construction would not indirectly induce growth in the area because the proposed Project would not include the extension of roads or other infrastructure. The proposed Project would provide repairs to curbs and sidewalks to comply with the applicable accessibility requirements and remove and replace street trees and utilities throughout the City. As such, proposed Project activities would take place on previously disturbed, urban areas and would result in a minor alteration of land that would restore or improve disturbed areas when compared to their original surface conditions. Therefore, no impacts would occur. This issue will not be further discussed in the EIR.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Reference: See XIII.b above.

Comment: A significant impact may occur if the proposed Project displaced substantial numbers of people, necessitating the construction of replacement housing elsewhere.

No Impact. The proposed Project would not displace substantial numbers of people and would not necessitate the construction of housing elsewhere because this is an infrastructure project. The proposed Project would not include housing or commercial development. In addition, proposed Project construction would not indirectly induce growth in the area because the proposed Project would not include the extension of roads or other infrastructure. The proposed Project would provide repairs to curbs and sidewalks to comply with the applicable accessibility requirements and remove and replace street trees and utilities throughout the City. As such, proposed Project activities would take place on previously disturbed, urban areas and would result in a minor alteration of land that would restore or improve disturbed areas when compared to their original surface conditions. Therefore, no impacts would occur. This issue will not be further discussed in the EIR.

XIV. Public Services	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a 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 following public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Would the project:

- a) **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?

Reference: L.A. CEQA Thresholds Guide (Section K.2); City of Los Angeles General Plan Safety Element.

Comment: A significant impact may occur if the proposed Project required the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service.

Less-than-Significant Impact. The proposed Project sites are served by various battalions and stations of LAFD throughout the City. The proposed Project would not result in a substantial increase in population and, thus, would not generate a need for new or altered fire protection facilities. Under all prototypical project types/construction scenarios, the proposed Project would be constructed in accordance with all applicable fire codes set forth by the state Fire Marshal and LAFD. Therefore, the proposed Project would not be considered a fire hazard and would not exceed the capacity of LAFD with respect to serving the site or other areas with existing fire protection services. The nearest local fire responders would be notified, as appropriate, of traffic control plans during construction so as to coordinate emergency response routing during construction work. Construction and operation of the proposed Project would not create hazards that would increase the need for fire protection. All construction would require prior coordination with the LAFD to ensure that emergency access is maintained at all times. Therefore, this impact would be less than significant. This issue will be further analyzed in the EIR.

ii. Police protection?

Reference: L.A. CEQA Thresholds Guide (Section K.1); City of Los Angeles General Plan Safety Element.

Comment: 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.

Less-than-Significant Impact. The proposed Project sites would be served by various divisions and stations of LAPD throughout the City. Typically, demand for additional police protection is created when there is an increase in the residential, commercial, or industrial population in an area. Under all prototypical project types/construction scenarios, the proposed Project would not require additional police protection beyond what is currently provided throughout its service areas because there would be no population growth associated with the proposed Project. The nearest local police station would be notified, as appropriate, of traffic control plans to coordinate emergency response routing during construction work. During construction, the proposed Project sites and areas would be fenced and screened, nighttime lighting provided, and access controlled to deter theft. Similarly, during proposed Project operation, an increase in calls to police is not anticipated due to the nature of the proposed work, repairing sidewalks. All construction would require prior coordination with LAFD to ensure that emergency access is maintained at all times. Therefore, this impact would be less than significant. This issue will be further analyzed in the EIR.

iii. Schools?

Reference: L.A. CEQA Thresholds Guide (Section K.3).

Comment: A significant impact may occur if the proposed Project included 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.

No Impact. The proposed Project would not include a housing component, nor would it directly or indirectly generate substantial employment or population growth, which usually results in the need for new schools or additional school population. Therefore, new or physically altered school facilities would not be required. The purpose of the proposed Project is to repair the sidewalks and other pedestrian passageways in urban areas. It does not entail the construction of residential, commercial, or industrial land uses that are normally associated with employment and population growth. Therefore, the proposed Project would not generate demand for school facilities that would exceed the capacity of the school district(s) responsible for serving the project site(s) under all prototypical project types/construction scenarios. Proposed Project construction could, however, potentially re-route pedestrian and vehicle traffic while repairs are being made. During this period of temporary disruption, access to school facilities would be maintained, and construction signage would delineate alternate access routes as necessary. Therefore, no impacts would occur, and this issue will not be further discussed in the EIR.

iv. Parks?

Reference: L.A. CEQA Thresholds Guide (Section K.4).

Comment: 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 and new or physically altered facilities were needed.

No Impact. No new or physically altered government facilities, such as recreation and park services, would be needed to accommodate population increases resulting from the implementation of the proposed Project. The purpose of the proposed Project is to repair the sidewalks and other pedestrian passageways in urban areas. It does not entail the construction of residential, commercial, or industrial land uses that are normally associated with such impacts. Therefore, it would not lead to an increase in population, nor would it induce growth or strain park services through direct or indirect means under all prototypical project types/construction scenarios. Proposed Project construction could, however, potentially re-route pedestrian and vehicle traffic while repairs are being made. During this period of temporary disruption, access to park and recreational facilities would be maintained, and construction signage would delineate alternate access routes as necessary. Therefore, no impacts would occur, and this issue will not be further discussed in the EIR.

v. Other public facilities?

Reference: None applicable.

Comment: A significant impact would occur if the proposed Project results in the need for new or altered public facilities, such as libraries, due to population or housing growth.

No impact. Typically, demand for new or altered public facilities such as libraries is created when there is an increase in the residential population in an area. The proposed Project would not result in an increase of residential units, nor would it contribute to overall population or housing growth under all prototypical project types/construction scenarios. Thus, the proposed Project would not result in the need for new or altered public facilities, such as libraries. No other facilities would be constructed or operated as a result of this proposed Project. No impacts would occur, and this issue will not be further discussed in the EIR.

XV. Recreation	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Would the project:

a) 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?

Reference: L.A. CEQA Thresholds Guide (Section K.4); City of Los Angeles, Department of Parks and Recreation (<http://www.laparks.org/departments/who-we-are>).

Comment: A significant impact may occur if the proposed Project included substantial employment or population growth that generated demand for public park facilities that exceed the capacity of existing parks or that substantially affected the level or service of existing park facilities.

No Impact. The City of Los Angeles contains 444 park sites with athletic fields, playgrounds, tennis courts, recreation centers, fitness areas, swimming pools and aquatic centers, senior centers, skate parks, golf courses, museums, and dog parks. Implementation of existing sidewalk and curb repair, and removal and replacement of street trees and utilities would not generate demand for public park facilities that would exceed the capacity of existing parks and recreational facilities. There would be no introduction of new population or housing in the City as a result of the proposed Project. It would not induce growth and would not strain park services through direct or indirect means under all prototypical project types/construction scenarios. Therefore, no impacts would occur, and this issue will not be further discussed in the EIR.

b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

Reference: None.

Comment: A significant impact may occur if the proposed Project would require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

No Impact. The City of Los Angeles contains 444 park sites. The proposed Project would not include recreational facilities, nor would it require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. The only areas that would be affected by the proposed Project would be sidewalks surrounding the recreational facilities. Proposed Project activities would take place on previously disturbed areas, would be temporary in duration, and would result in a minor alteration of land that would restore or improve disturbed areas when compared to their original surface conditions. Therefore, no impacts would occur, and this issue will not be further discussed in the EIR.

XVI. Transportation/Traffic	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including, but not limited to, level-of-service standards and travel demand measures or other standards established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially increase hazards because of a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would the project:

- a) Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

Reference: L.A. CEQA Thresholds Guide (Section L).

Comment: A project would have a significant traffic impact if the traffic volume to roadway capacity ratio (V/C) is increased, as follows:

- V/C ratio increase >0.080 if final Level of Service (LOS) is C.
- V/C ratio increase >0.040 if final LOS is D.
- V/C ratio increase >0.020 if final LOS is E or F.

“Final LOS” is defined as projected future conditions including project, ambient, and related project growth but without project traffic mitigation.

Potentially Significant Impact. During the course of construction activities, work zones would be established within and adjacent to existing roadways, potentially requiring lane or parking zone closures for approximately 2–3 weeks or more than 5 weeks. Temporary signage, traffic cones, fencing, and barriers would be placed where needed during the construction period. In addition, staging areas and work zones could displace existing parking at various locations (e.g., schools and roadways). Following construction activities, sidewalks would be repaired, and there would be no proposed Project-related adverse effects on roadway operations. The potential for construction activities to conflict with the performance of existing public transit, bicycle, or pedestrian facilities will be further evaluated in the EIR. In addition, the proposed Project would include changing the permit process for street tree removal, which could include an ordinance and/or policy setting criteria for street tree replacement ratios or specifying species, size, or location of replacement street trees. This issue will be further analyzed in the EIR.

- b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?**

Reference: L.A. CEQA Thresholds Guide (Section L).

Comment: A significant impact may occur if the proposed Project conflicts with the 2010 Los Angeles County Metropolitan Transportation Authority Congestion Management Program.

Potentially Significant Impact. As described in XVI.a, the proposed Project could disrupt traffic and conflict with congestion management plans or existing level-of-service standards during construction period, as temporary lane or parking zone closures could be required. The potential for the proposed Project to conflict with congestion management plans or level-of-service standards related to the circulation system will be further analyzed in the EIR.

- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?**

Reference: L.A. CEQA Thresholds Guide (Section L).

Comment: A significant impact may occur if the proposed Project results in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks.

Less-than-Significant Impact. The proposed Project would involve repairing sidewalks and would therefore not result in a change in air traffic patterns. Construction activities may occur in areas within airport influence areas, but would not be adjacent to existing runways such that an alteration of air traffic patterns would occur. Therefore, this impact would be less than significant, and this issue will be further analyzed in the EIR.

- d) Substantially increase hazards because of a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

Reference: L.A. CEQA Thresholds Guide (Section L.5).

Comment: A significant impact may occur if the proposed Project substantially increased road hazards due to a design feature or incompatible uses.

Less-than-Significant Impact. During the construction period, work zones would be established within and adjacent to roadways and would include heavy machinery, handheld equipment, and street tree/vegetation removal activities; and lane and parking zone closures could be required for

some work zones. Following the construction period, no adverse operational effects related to traffic hazards would occur. The proposed Project sites would be compliant with applicable accessibility requirements, which would reduce design hazards and improve intersection functionality and safety. Therefore, there would be a less-than-significant impact, and this issue will be further analyzed in the EIR.

e) Result in inadequate emergency access?

Reference: L.A. CEQA Thresholds Guide (Section L.5 and L.8).

Comment: A significant impact may occur if the proposed Project resulted in inadequate emergency access.

Less-than-Significant Impact. During the construction period, parking zone and lane closures could be required to accommodate work zones and the use of equipment. Both parking zone and lane closures could affect access to roadways that are used by emergency providers. Construction activities could result in the temporary disruption of existing roads. Disruption of traffic during the construction period has the potential to delay fire personnel, police, or other first responders and possibly to increase response times. All construction would require prior coordination with the LAFD to ensure that emergency access is maintained at all times. Therefore, there would be a less-than-significant impact, and this issue will be further analyzed in the EIR.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Reference: L.A. CEQA Thresholds Guide (Section L).

Comment: A significant impact may occur if the proposed Project were to conflict with adopted policies, plans, or programs supporting alternative transportation.

Potentially Significant Impact. Construction activities would take place along roadways that are designated as bus corridors. Buses could be delayed if lanes are needed to provide space for work zones. Bus stops may be temporarily relocated in consideration of the locations of the work zones. Sidewalk closures and work zones would also temporarily preclude the use of sidewalks by pedestrians, and temporary detours would be provided until construction is complete. Following the construction period, the proposed Project would improve sidewalks for pedestrians and transit users, and no adverse effects would occur. Discussion of replacement of non-conforming (relative to Mobility 2035) facilities will be addressed in the EIR. The potential for the proposed Project construction activities to conflict with applicable plans, ordinances, or policies related to the circulation system will be further analyzed in the EIR.

	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
XVII. Tribal Cultural Resources				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would the project:

- a) Cause a substantial adverse change in the significance of a tribal cultural resource that is 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)?**

Comment: A significant impact may result if the proposed Project caused a substantial adverse change to the significance of a tribal cultural resource.

Potentially Significant Impact. It is likely that there are tribal cultural resources in the proposed Project area. Also, previously unknown tribal cultural resources may be discovered as a result of Native American consultation or during proposed Project-related ground disturbance. If resources are found, construction work would be stopped and an assessment of the resources would be required. This issue will be further analyzed in the EIR.

- b) Cause a substantial adverse change in 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?**

Comment: A significant impact may result if the proposed Project caused a substantial adverse change to the significance of a tribal cultural resource.

Potentially Significant Impact. See discussion for XVII.a above. This issue will be further analyzed in the EIR.

XVIII. Utilities and Service Systems	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or would new or expanded entitlements be needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Reference: L.A. CEQA Thresholds Guide (Section M.2)

Comment: A significant impact would occur if the proposed Project discharges wastewater that would exceed the regulatory limits established by the Los Angeles RWQCB.

Less-than-Significant Impact. The proposed Project would provide repairs and upgrades to sidewalks, pavement, curbs, and slopes that are non-compliant with the applicable accessibility requirements throughout the City. Required construction activities would include excavation of existing sidewalks, grading, construction of the repaired portions of sidewalks, and cleanup of construction sites. Construction activities related to excavation and grading are expected to produce negligible amounts of wastewater. Construction workers

would be expected to follow standard BMPs, which would reduce any construction-related wastewater impacts. Impacts would be less than significant, and this issue will be further analyzed in the EIR.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Reference: L.A. CEQA Thresholds Guide (Sections M.1 and M.2)

Comment: A significant impact may occur if the proposed Project resulted in the need for new construction or expansion of water or wastewater treatment facilities that could result in an adverse environmental effect that could not be mitigated.

Less-than-Significant Impact. See XVIII.a. The proposed Project would provide repair and upgrades to sidewalks, pavement, curbs, and non-compliant slopes throughout the City. Construction activities associated with the proposed Project would include street tree root pruning, street tree canopy pruning, street tree removal, street tree planting, sidewalk repaving, enlarging street tree wells, relocation of street signs and street lights, construction of walls (under 3 feet), and replacement of utility covers. These activities would occur over the life of the proposed Project (approximately 30 years), during which time watering of the site or wastewater may be discharged from the construction areas. Such wastewater discharges must be compliant with applicable regulations such as the City's MS4 Permit (Order No. R4-2012-0175) for areas under 1 acre, and, for any portion of the proposed Project replacing over 1 acre of sidewalk, the proposed Project would be required to comply with the CGP through the State Water Resources Control Board. The CGP and associated NPDES requirements include development and implementation of a SWPPP with associated monitoring and reporting. Stormwater BMPs are required to control erosion, minimize sedimentation, and control stormwater runoff water quality during construction activities. The EIR will discuss the proposed Project water and wastewater requirements. Furthermore, construction workers would be expected to follow BMPs, which would reduce any construction-related wastewater impacts. It is not anticipated that the proposed Project would require the construction of new water or wastewater treatment facilities or expansion of existing facilities. In addition, the proposed Project would include changing the permit process for street tree removal, which could include an ordinance and/or policy setting criteria for street tree replacement ratios or specifying species, size, or location of replacement street trees. This issue will be further analyzed in the EIR.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Reference: L.A. CEQA Thresholds Guide (Section M.2).

Comment: A significant impact may occur if the volume of stormwater runoff from the proposed Project increases to a level exceeding the capacity of the storm drain system serving a proposed Project site.

Potentially Significant Impact. The proposed Project would provide repairs to curbs and sidewalks to comply with the applicable accessibility requirements, and would remove and replace street trees and utilities throughout the City. These repairs could include curb and gutters, curb ramps, and utility relocation. In some cases, repairs and upgrades of existing sidewalks may require the partial reconfiguration of existing stormwater drainage facilities. Compliance with the minimum construction site BMP requirements in the MS4 Permit, or the CGP SWPPP that require construction

phase BMPs would ensure that construction activities would not degrade the surface water quality of receiving waters to levels below standards considered acceptable by the Los Angeles RWQCB or other regulatory agencies or impair the beneficial uses of receiving waters. The proposed Project would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities. As such, proposed Project activities would take place on previously disturbed, urban areas and would result in land that would restore or improve disturbed areas when compared to their original surface conditions. This issue will be further analyzed in the EIR.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Reference: L.A. CEQA Thresholds Guide (Section M.1).

Comment: A significant impact may occur if the proposed Project's water demands would exceed the existing water supplies that serve the site.

Potentially Significant Impact. The proposed Project would provide repairs and upgrades to sidewalks, pavement, curbs, and slopes that are non-compliant with the applicable accessibility requirements throughout the City. Required construction activities would include excavation of existing sidewalks, grading, construction of the repaired portions of sidewalks, and cleanup of construction sites. Water would be used during concrete work, grading, dust suppression, and other construction activities. Water would also be required to establish new street trees during the first 3 years after planting. The City usually provides watering of the street trees from a water truck. The water uses described above could result in a substantial permanent increase in water consumption, and this issue will be discussed in the EIR. In addition, the proposed Project would include changing the permit process for street tree removal, which could include an ordinance and/or policy setting criteria for street tree replacement ratios or specifying species, size, or location of replacement street trees. This issue will be further analyzed in the EIR.

e) 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?

Reference: L.A. CEQA Thresholds Guide (Section M.2).

Comment: A significant impact may occur if the proposed Project results in a determination by the wastewater treatment provider that serves or may serve the proposed Project that it does not have adequate capacity to serve the proposed Project's projected demand in addition to the provider's existing commitments.

Less-than-Significant Impact. See XVIII.a. LA Sanitation (LASAN) is the wastewater treatment provider for the City. The proposed Project would produce negligible amounts of wastewater for each sidewalk project. Furthermore, construction workers would be expected to follow standard BMPs, which would reduce any construction-related wastewater impacts. Therefore, LASAN would have adequate capacity to serve the proposed Project's projected demand in addition to LASAN existing commitments. Impacts would be less than significant, and this issue will be further analyzed in the EIR.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Reference: L.A. CEQA Thresholds Guide (Section M.3); California Department of Resources Recycling and Recovery (2010), Solid Waste Information System (<http://www.calrecycle.ca.gov/SWFacilities/Directory/>); City of Los Angeles Solid Waste Integrated Resources Plan (<http://www.zerowaste.lacity.org>) and LASAN (http://www.lacitysan.org/solid_resources/recycling); California Integrated Waste Management Act of 1989 (Assembly Bill 939).

Comment: The management of solid waste in the City involves public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. A significant impact would occur if the proposed Project results in solid waste generation of 5 tons or more per week.

Potentially Significant Impact. The proposed Project would provide repairs and upgrades to sidewalks, pavement, curbs, and slopes that are non-compliant with the applicable accessibility requirements throughout the City. Excavation of existing sidewalks, curbs, and other public ROW improvements would result in solid waste that would need proper disposal and that could require disposal as hazardous waste. Proposed sidewalk repair would occur over a 30-year time period, and substantial amounts of reconstruction would be occurring simultaneously throughout the City as a result of the proposed Project. In addition, on March 5, 2010, Council approved Council File 09-3029 pertaining to a Citywide Construction and Demolition (C and D) Waste Recycling Ordinance that requires all mixed C and D waste generated within City limits be taken to City-certified C and D waste processors. LASAN is responsible for the C and D waste recycling policy. The Zero Waste Progress Report 2013 conducted by the UCLA Engineering Extension's Municipal Solid Waste Management Program reported that the City has achieved a recycling rate of 76.4 percent. An additional survey conducted by the UCLA Engineering Extension reported that the City has the highest recycling rate out of the 10 largest U.S. cities. All construction projects are subject to the City's requirements for construction waste recycling. The proposed Project would result in large amounts of sidewalk, curb, and gutter waste, some of which could be classified as hazardous waste. This issue will be further analyzed in the EIR.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

Reference: L.A. CEQA Thresholds Guide (Section M.3)

Comment: 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.

Less-than-Significant Impact. The proposed Project would provide repairs and upgrades to sidewalks, pavement, curbs, and slopes that are non-compliant with the applicable accessibility requirements throughout the City. Disposal of all solid waste generated by the proposed Project would comply with federal, state, and local statutes and regulations related to solid waste. Disposal of hazardous waste must be compliant with applicable regulations such as the Resource Conservation and Recovery Act (RCRA), DOT Hazardous Materials Regulations, and Los Angeles County General Plan goals and policies. The Citywide Construction and Demolition (C and D) Waste Recycling Ordinance requires all mixed C and D waste generated within City limits be taken to City-certified C and D waste processors. Construction waste would be disposed of in compliance with applicable regulations. Therefore, impacts would be less than significant in terms of the proposed Project's compliance with federal, state, and local statutes and regulations, and this issue will be further analyzed in the EIR.

XIX. Mandatory Findings of Significance		Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
a.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	Does the project have impacts that are individually limited but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would the project:

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

Reference: Preceding analyses.

Comment: None.

Potentially Significant Impact. The proposed Project would entail sidewalk repairs and associated improvements throughout the City, including street root pruning, street tree removal and replacement, street tree planning, sidewalk-repaving, and enlarging street tree wells. The study area, which consists of the City and the surrounding area, are built out with various land uses, which could contain designated ESHAs and contain sensitive species and associated habitats. Similarly, proposed sidewalk repairs could occur within designated historic districts. The EIR will further analyze the proposed Project’s potential to substantially affect or reduce the habitat of a fish or wildlife species, and/or cause a fish or wildlife population to drop below self-sustaining levels. The EIR will also analyze the proposed Project’s potential to eliminate a plant or animal community, and reduce the number or restrict the range of rare or endangered plants or animals, and the potential to affect important examples of the major periods of California history or prehistory.

- b) 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)?**

Reference: Preceding analyses.

Comment: None.

Potentially Significant Impact. As stated earlier, the proposed Project would include construction associated with sidewalk repair and other associated improvements including street root pruning, street tree removal and replacement, street tree planning, sidewalk-repaving, and enlarging street tree wells for 30 years. Most of the impacts are anticipated to be localized and confined to the immediate study area; however, during the course of the proposed Project there could be significant impacts on several resource areas, including: aesthetics, air quality, biological resources, cultural resources, geology/soils, GHG emissions, hydrology/water quality, noise, transportation/traffic, and utilities/services. These impacts could contribute to cumulative impacts. These issues will be further analyzed in the EIR.

- c) Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?**

Reference: Preceding analyses.

Comment: None.

Potentially Significant Impact. The proposed Project would include sidewalk repair including street root pruning, street tree removal and replacement, street tree planning, sidewalk-repaving, and enlarging street tree wells. Potentially significant impacts associated with aesthetics, air quality, biological resources, cultural resources, geology/soils, GHG emissions, hydrology/water quality, noise, transportation/traffic, and utilities/service systems could occur. Therefore, implementation of the proposed Project could result in significant adverse effects on human beings, either directly or indirectly. These issues will be further analyzed in the EIR.

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Chapter 4

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Initial Study Preparation and Oversight

City of Los Angeles

Ted Bardacke, AICP, LEED AP, Director of Infrastructure, Office of the Mayor

Steven Chen, P.E., SSD, Division Manager

Harold Davis, SRP, ADA Coordinator, LEED AP, CASP

Amber Elton, P.E., SRP, Civil Engineer

Dr. Jan Green Rebstock, EMG, Environmental Supervisor II

Amanda Griesbach, MS, EMG, Environmental Specialist II

Shilpa Gupta, MPA, EMG, Environmental Supervisor I

Alice Kim, P.E., SRP, Civil Engineer

Ronald Lorenzen, Assistant Director of Bureau of Street Services

Maria Martin, EMG, Manager

Jennifer Pope McDowell, M.Arch., Infrastructure Policy Analyst, Office of the Mayor

Luis Montemayor, Land Development & GIS Division, GIS Chief

Mary Nemick, BOE, Director of Communications

Nathan Neumann, LGD, GIS Programmer/Analyst

Julie Sauter, P.E., SRP, Deputy City Engineer

Geoffrey Straniere, DOD, Senior Project Coordinator

Tim Tyson, BSS, Street Tree Superintendent II

Arsen Voskerchyan, P.E., SRP, Senior Civil Engineer

ICF

Kim Avila, AICP, Project Director

Tamseel Mir, Project Manager

Mario Barrera, Geology & Soils, Hazards and Hazardous Materials

Andrew Bursan, Architectural Historian

Stephen Bryne, Archaeology, Tribal Resources

Will Herron, Planner

Jonathan Higginson, Noise

Andrew Johnson, Planner

Joel Mulder, Biologist

Terry Rivasplata, Technical Director

Mark Robinson, Paleontology

Laura Rocha, Water Resources

Alison Rondone, Senior Planner, QA/QC

Rusty Whisman, Air Quality, Transportation

Chapter 6

Acronyms and Abbreviations

AB	Assembly Bill
AB 32	California Global Warming Solutions Act of 2006
ADA	Americans with Disabilities Act
APCs	Area Planning Commissions
Basin	South Coast Air Basin
BMPs	Best Management Practices
BSS	Bureau of Street Services
Caltrans	California Department of Transportation
CAO	City Administrative Officer
CAPCOA	California Air Pollution Control Officers Association
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CGP	Construction General Permits
City	City of Los Angeles
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CO ₂ e	Carbon Dioxide Equivalent
Council	Los Angeles City Council
dBA	A-weighted Decibels
DOT	Department of Transportation
EIR	Environmental Impact Report
ESHA	Environmentally Sensitive Habitat Area
GHG	Greenhouse Gas
GIS	Geographic Information System
Greenbook	Standard Specification for Public Works Construction
HCPs	Habitat Conservation Plans
HPOZs	Historic Preservation Overlay Zones
IS	Initial Study
BOE	City of Los Angeles, Public Works Department, Bureau of Engineering
LADBS	Los Angeles Department of Building and Safety
LADPW	Los Angeles Department of Public Works
LAFD	Los Angeles Fire Department
LAPD	Los Angeles Police Department
LASAN	LA Sanitation
LAX	Los Angeles International Airport
LOS	Level of Service

MBTA	Migratory Bird Treaty Act
MMRP	Mitigation Monitoring and Reporting Program
MS4	Municipal Separate Storm Sewer System
MT	Metric Tons
NCCP	Natural Community Conservation Plan
NOA	Notice of Availability
NOD	Notice of Determination
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
OSHA	Occupational Safety and Health Administration
Policy	Board of Public Works Street Tree Removal Permit Process and Policy
Prioritization System	Prioritization Matrix and Scoring System
proposed Project	Sidewalk Repair Program
RCRA	Resource Conservation and Recovery Act
ROW	Right-of-Way
RWQCB	Los Angeles Regional Water Quality Control Board
SCAQMD	South Coast Air Quality Management District
Settlement	Willits v. City of Los Angeles Settlement Term Sheet
SR-	State Route
SWPPP	Stormwater Pollution Prevention Plan
TAC	Toxic Air Contaminant
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
V/C	Volume to Capacity
ZIMAS	Zone Information & Map Access System

Appendix A

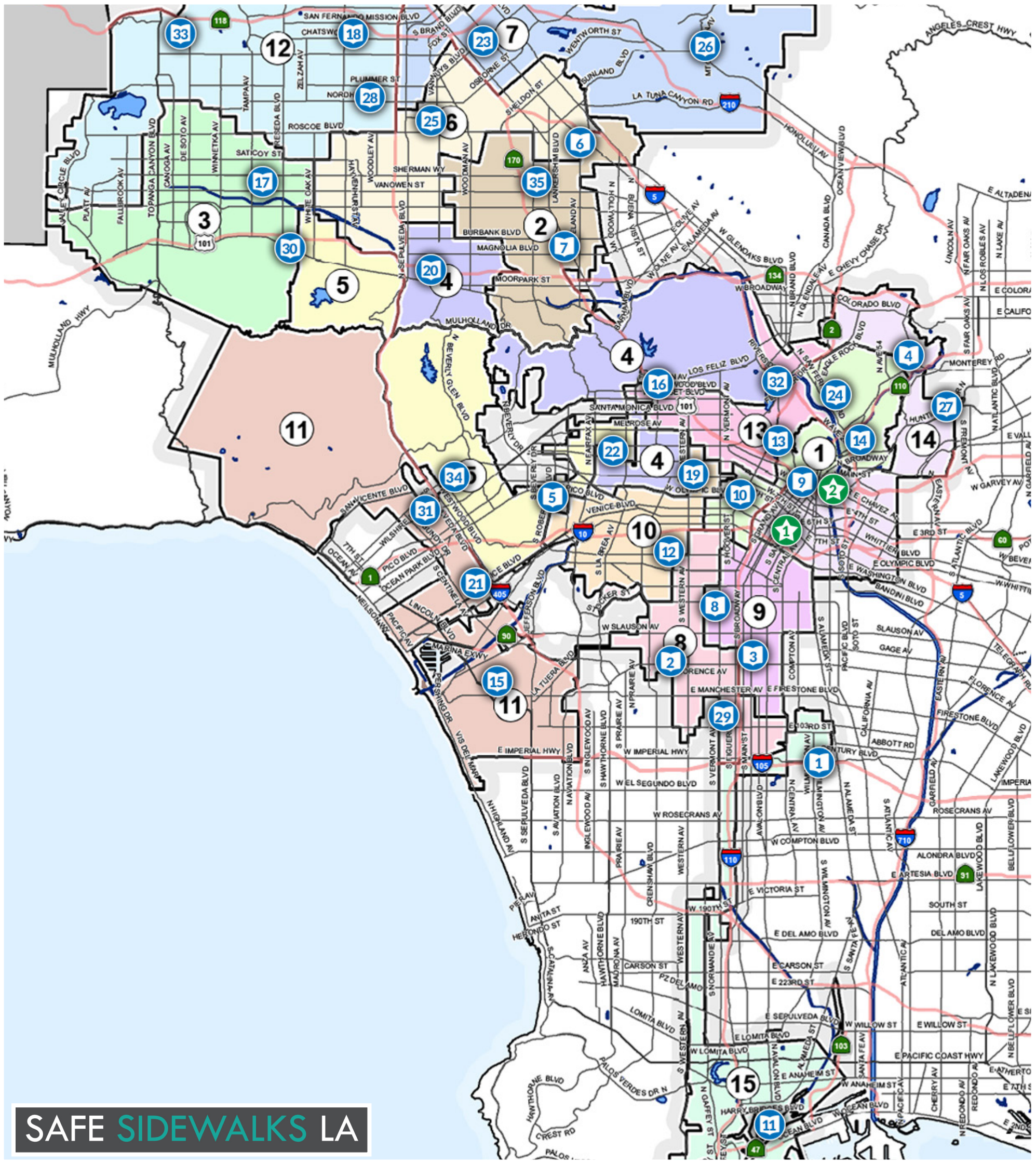
List of NOP/IS Availability Locations And Map

Copies of the NOP/IS are available for review at the following locations:

Council District	Organization	Address
CD 1	Lincoln Heights Branch Library	2530 Workman St, Los Angeles, CA 90031
	Cypress Park Branch Library	1150 Cypress Ave, Los Angeles, CA 90065
	Pico Union Branch Library	1030 S Alvarado St, Los Angeles, CA 90006
CD 2	North Hollywood Amelia Earhart Regional Library	5211 Tujunga Ave, North Hollywood, CA 91601
	Valley Plaza Library	12311 Vanowen St, North Hollywood, CA 91605
CD 3	West Valley Regional Branch Library	19036 Vanowen St, Reseda, CA 91335
	Encino-Tarzana Branch Library	18231 Ventura Blvd, Tarzana, CA 91356
CD 4	Sherman Oaks Library	14245 Moorpark St, Sherman Oaks, CA 91423
	Fairfax Branch Public Library	161 S Gardner St, Los Angeles, CA 90036
CD 5	Robertson Library	1719 Robertson Blvd, Los Angeles, CA 90035
	Westwood Branch Library	1246 Glendon Ave, Los Angeles, CA 90024
CD 6	Sun Valley Library	7935 Vineland Ave, Sun Valley, CA 91352
	Panorama City Branch Library	14345 Roscoe Blvd, Panorama City, CA 91402
CD 7	Sunland-Tujunga Branch Library	7771 Foothill Blvd, Tujunga, CA 91042
	Pacoima Branch Library	13605 Van Nuys Blvd, Pacoima, CA 91331
CD 8	Hyde Park Branch Library	2205 W Florence Ave, Los Angeles, CA 90043
	Mark Twain Library	9621 S. Figueroa Street, Los Angeles, CA 90003
CD 9	Ascot Branch Library	120 W Florence Ave, Los Angeles, CA 90003

Council District	Organization	Address
	Vermont Square Branch Library	1201 W 48th St, Los Angeles, CA 90037
CD 10	Jefferson Library	2211 W Jefferson Blvd, Los Angeles, CA 90018
	Pio Pico Library	694 S Oxford Ave, Los Angeles, CA 90005
CD 11	Westchester Loyola Village Library	7114 W Manchester Ave, Los Angeles, CA 90045
	Mar Vista Branch Library	12006 Venice Blvd, Los Angeles, CA 90066
	West Los Angeles Regional Library	11360 California Route 2, Los Angeles, CA 90025
CD 12	Granada Hills Library	10640 Petit Ave, Granada Hills, CA 91344
	Mid Valley Regional Library	16244 Nordhoff St, North Hills, CA 91343
	Chatsworth Branch Library	21052 Devonshire St, Chatsworth, CA 91311
CD 13	Edendale Branch Library	2011 Sunset Blvd, Los Angeles, CA 90026
	Frances Howard Goldwyn-Hollywood Regional Branch Library	1623 Ivar Ave, Los Angeles, CA 90028
	Silver Lake Branch Library	2411 Glendale Blvd, Los Angeles, CA 90039
CD 14	Arroyo Seco Library	6145 N Figueroa St, Los Angeles, CA 90042
	The Los Angeles Central Library	630 W 5th St, Los Angeles, CA 90071
	El Sereno Branch Library	5226 S. Huntington Drive, Los Angeles, CA 90032
CD 15	San Pedro Regional Library	931 S Gaffey St, San Pedro, CA 90731
	Willowbrook Library	11838 Wilmington Ave, Los Angeles, CA 90059

Organization	Address
City of Los Angeles Bureau of Engineering	1149 S. Broadway, Suite 600, Los Angeles, CA 90015
City of Los Angeles City Clerk	200 N. Spring Street, Room 360, Los Angeles, CA 90012



SAFE SIDEWALKS LA

SRP PRIORITY COMMUNITIES



BRANCH LIBRARIES

- | | | |
|--|--|---------------------------------------|
| 1. Willowbrook Library | 14. Lincoln Heights Branch Library | 25. Panorama City Branch Library |
| 2. Hyde Park Branch Library | 15. Westchester Loyola Village Library | 26. Sunland-Tujunga Branch Library |
| 3. Ascot Branch Library | 16. Frances Howard Goldwyn-Hollywood Regional Branch Library | 27. El Sereno Branch Library |
| 4. Arroyo Seco Library | 17. West Valley Regional Branch Library | 28. Mid-Valley Regional Library |
| 5. Robertson Library | 18. Granada Hills Library | 29. Mark Twain Library |
| 6. Sun Valley Library | 19. Pio Pico Library | 30. Encino-Tarzana Branch Library |
| 7. North Hollywood Amelia Earhart Regional Library | 20. Sherman Oaks Library | 31. West Los Angeles Regional Library |
| 8. Vermont Square Branch Library | 21. Mar Vista Branch Library | 32. Silver Lake Branch Library |
| 9. The Los Angeles Central Library | 22. Fairfax Branch Public Library | 33. Chatsworth Branch Library |
| 10. Pico Union Branch Library | 23. Pacoima Branch Library | 34. Westwood Branch Library |
| 11. San Pedro Regional Library | 24. Cypress Park Branch Library | 35. Valley Plaza Library |
| 12. Jefferson Library | | |
| 13. Edendale Branch Library | | |



OTHER LOCATIONS

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|--|-----------------------------------|
| 1. City of Los Angeles Bureau of Engineering | 2. City of Los Angeles City Clerk |
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COUNCIL DISTRICT

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