City of Los Angeles

Department of City Planning

City Hall • 200 N. Spring Street, Room 721 • Los Angeles, CA 90012

INITIAL STUDY

PALMS - MAR VISTA - DEL REY COMMUNITY PLAN AREA

Del Rey Pointe Residential Project

Case Number: ENV-2016-4267-MND

Project Location: 5000 Beethoven Street, Los Angeles, California, 90066

Council District: 11 – Mike Bonin

Project Description:

The Del Rey Pointe Residential Project ("Proposed Project") is a multi-family residential project consisting of 236 residential apartment units and residential amenities (including a community room and business center, a gym/spa and a pool and patio area), with a total of 406 parking spaces, provided in one level of subterranean parking, one level of semi-subterranean parking, and on-grade parking. Of the 236 dwelling units, five percent (12 units) will be set aside for Extremely Low Income, and 11 percent (26 units) will be set aside for Very Low Income Housing, for a total of 38 affordable units in compliance with Ballot Measure JJJ. The proposed Project would also provide 276 bicycle parking spaces (36 short-term and 240 long-term). The Project would be six (6) stories and up to 56 feet in height, with a total gross building area of 235,000 sf for a Floor Area Ratio (FAR) of 1.93:1. Vehicular access to the project site would be provided via a private street and private traffic bridge over Centinela Creek to the south (granted by means of an easement with the County of Los Angeles) and an adjoining lot at 5300 Beethoven Street. In addition, a pedestrian/bicycle bridge is proposed to connect the existing Ballona Creek Bikeway on the north to the subject site and proposed vehicular bridge to the south. The Project includes two natural habitat preserves on the westerly and easterly portions of the lot, and a linear park with pedestrian and bicycle paths along the perimeter of the site. The project involves export of approximately 31,430 cubic yards of soil, and the removal of one (1) non-protected on-site tree. The project also involves the extension of utilities and other infrastructure including roads, sewer, storm drains, etc. to serve the subject site.

The project site is located at 5000 Beethoven Street in the Palms - Mar Vista - Del Rey Community Plan Area of the City of Los Angeles. The approximately 121,493 square foot triangular-shaped site is located on a peninsula bounded by the confluence of Ballona Creek to the north, Centinela Creek to the south and vacant land to the east. The State Route 90 Marina Freeway (SR 90 Freeway) is adjacent to the site to the northeast. The site is currently undeveloped, vacant land.

The applicant is requesting: (1) a General Plan Amendment from Light Industrial to High Medium Residential; (2) a Vesting Zone Change from [T][Q]M2-1 (Light Industrial) to [T][Q]R4-1 (High Medium Residential) per LAMC Section 12.32.Q.3.A; (3) Approval of Site Plan Review findings per LAMC Section 16.05; (4) Approval of a Private Street; (5) Approval of a Development Agreement; (6) Adoption of the Expanded Initial Study/Mitigated Negative Declaration (IS/MND); and (7) Other permits, ministerial or discretionary, may be necessary in order to execute and implement the project. Such approvals may include, but are not limited to: landscaping approvals, exterior approvals, storm water discharge permits, grading permits, haul route permits, and installation and hookup approvals for public utilities and related permits.

APPLICANT:	PREPARED BY:	ON BEHALF OF:
5000 Beethoven, LLC 5300 Beethoven Avenue Los Angeles, CA 90066	Impact Sciences, Inc. 28 N. Marengo Avenue Pasadena, CA 91101	City of Los Angeles Department of City Planning

September 2019

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I. INTRODUCTION

INTRODUCTION

The subject of this Initial Study (IS) is the proposed Del Rey Pointe Residential Project ("Project"). The proposed Project involves the development of a multi-family residential project consisting of 236 residential apartment units and residential amenities (including a community room and business center, a gym/spa and a pool and patio area), with a total of 406 parking spaces, provided in one level of subterranean parking, one level of semi-subterranean parking, and on-grade parking. Of the 236 dwelling units, five percent (12 units) will be set aside for Extremely Low Income and 11 percent (26 units) will be set aside for Very Low Income Housing, for a total of 38 affordable units in compliance with Ballot Measure JJJ. The proposed Project would also provide 276 bicycle parking spaces (36 short-term and 240 long-term). The Project would be six (6) stories and up to 56 feet in height, with a total gross building area of 235,000 sf for a Floor Area Ratio (FAR) of 1.93:1.

Vehicular access to the project site would be provided via a private street and private traffic bridge over Centinela Creek to the south (granted by means of an easement with the County of Los Angeles) and an adjoining lot at 5300 Beethoven Avenue. The private street will extend south of the property for a distance of approximately 205 feet before it approaches Beethoven Street. The private street will have varying widths and improvements as it crosses the Centinela Creek flood control channel (39 feet wide including a 28-foot wide bridge with a 20-foot roadway and 6.5-foot wide sidewalk) and private property at 5300 Beethoven Street (40 feet wide including a 20-foot roadway and sidewalk ranging from 6.5 to 12 feet). In addition, a pedestrian/bicycle bridge is proposed to connect the existing Ballona Creek Bikeway on the north to the subject site and proposed vehicular bridge to the south.

The Project includes two natural habitat preserves on the westerly and easterly portions of the lot, and a linear park with pedestrian and bicycle paths along the perimeter of the site. The project involves export of approximately 31,430 cubic yards of soil, and the removal of one (1) non-protected on-site tree. The project also involves the extension of utilities and other infrastructure including roads, sewer, storm drains, etc. to serve the subject site.

The project site is located at 5000 Beethoven Street in the Palms - Mar Vista - Del Rey Community Plan Area of the City of Los Angeles. The approximately 121,493 square foot triangular-shaped site is located on a peninsula bounded by the confluence of Ballona Creek to the north, Centinela Creek to the south and vacant land to the east. The State Route 90 Marina Freeway (SR 90 Freeway) is adjacent to the site to the northeast. The site is currently undeveloped, vacant land.

The applicant is requesting: (1) a General Plan Amendment from Light Industrial to High Medium Residential; (2) a Vesting Zone Change from [T][Q]M2-1 (Light Industrial) to [T][Q]R4-1 (High Medium Residential) per LAMC Section 12.32.Q.3.A; (3) Approval of Site Plan Review findings per LAMC Section 16.05; (4) Approval of a Private Street; (5) Approval of a Development Agreement; (6) Adoption of the Expanded Initial Study/Mitigated Negative Declaration (IS/MND); and (7) Other permits, ministerial or discretionary, may be necessary in order to execute and implement the project. Such approvals may include, but are not limited to: landscaping approvals, exterior approvals, storm water discharge permits, grading permits, haul route permits, and installation and hookup approvals for public utilities and related permits..

The Project Site is located at 5000 Beethoven Street in the City of Los Angeles in the Palms-Mar Vista-Del Rey Community Planning Area. The Project Applicant is 5000 Beethoven, LLC. A detailed description of the proposed Project is contained in Section II (Project Description). The City of Los Angeles Department of City Planning is the Lead Agency under the California Environmental Quality Act (CEQA).

PROJECT INFORMATION

Project Title: Del Rey Pointe Residential Project

Project Location: 5000 Beethoven Street
Los Angeles, CA 90066
Palms - Mar Vista - Del Rey Community Planning Area

Project Applicant: 5000 Beethoven, LLC

Lead Agency: City of Los Angeles Department of City Planning
200 N. Spring St., Room 721
Los Angeles, CA 90012

PURPOSE AND ORGANIZATION OF THE INITIAL STUDY

An Initial Study is a preliminary analysis prepared by and for the City of Los Angeles as Lead Agency to determine whether an Environmental Impact Report or a Negative Declaration or Mitigated Negative Declaration must be prepared for a proposed project.

CEQA Guideline 15063 states:

(a) The Lead Agency shall conduct an Initial Study to determine if the project may have a significant effect on the environment. If the Lead Agency can determine that an EIR will clearly be required for the project, an Initial Study is not required but may still be desirable.

(1) All phases of project planning, implementation, and operation must be considered in the Initial Study of the project.

(2) The lead agency may use an environmental assessment or a similar analysis prepared pursuant to the National Environmental Policy Act.

(3) An initial study may rely upon expert opinion supported by facts, technical studies or other substantial evidence to document its findings. However, an initial study is neither intended nor required to include the level of detail included in an EIR.

(b) Results.

(1) If the agency determines that there is substantial evidence that any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial, the Lead Agency shall do one of the following:

(A) Prepare an EIR, or

(B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or

(C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration. Another appropriate process may include, for example, a master EIR, a master environmental assessment, approval of housing and neighborhood commercial facilities in urban areas, approval of residential projects pursuant to a specific plans described in section 15182, approval of residential projects consistent with a community plan, general plan or zoning as described in section 15183, or an environmental document prepared under a State certified regulatory program. The lead

agency shall then ascertain which effects, if any, should be analyzed in a later EIR or negative declaration.

(2) The Lead Agency shall prepare a Negative Declaration if there is no substantial evidence that the project or any of its aspects may cause a significant effect on the environment.

(c) Purposes. The purposes of an Initial Study are to:

(1) Provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR or a Negative Declaration.

(2) Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a Negative Declaration.

(3) Assist in the preparation of an EIR, if one is required, by:

(A) Focusing the EIR on the effects determined to be significant,

(B) Identifying the effects determined not to be significant,

(C) Explaining the reasons for determining that potentially significant effects would not be significant, and

(D) Identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environmental effects.

(4) Facilitate environmental assessment early in the design of a project;

(5) Provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment;

(6) Eliminate unnecessary EIRs;

(7) Determine whether a previously prepared EIR could be used with the project.

(d) Contents. An Initial Study shall contain in brief form:

(1) A description of the project including the location of the project;

(2) An identification of the environmental setting;

(3) An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries. The brief explanation may be either through a narrative or a reference to another information source such as an attached map, photographs, or an earlier EIR or negative declaration. A reference to another document should include, where appropriate, a citation to the page or pages where the information is found.

(4) A discussion of the ways to mitigate the significant effects identified, if any;

(5) An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls;

(6) The name of the person or persons who prepared or participated in the Initial Study.

(e) Submission of Data. If the project is to be carried out by a private person or private organization, the Lead Agency may require such person or organization to submit data and information which will enable the Lead Agency to prepare the Initial Study. Any person may submit any information in any form to assist a Lead Agency in preparing an Initial Study.

(f) Format. Sample forms for an applicant's project description and a review form for use by the lead agency are contained in Appendices G and H. When used together, these forms would meet the requirements for an initial study, provided that the entries on the checklist are briefly explained pursuant to subsection (d)(3). These forms are only suggested, and public agencies are free to devise their own format for an initial study. A previously prepared EIR may also be used as the initial study for a later project.

(g) Consultation. As soon as a Lead Agency has determined that an Initial Study will be required for the project, the Lead Agency shall consult informally with all Responsible Agencies and all Trustee Agencies responsible for resources affected by the project to obtain the recommendations of those agencies as to whether an EIR or a Negative Declaration should be prepared. During or immediately after preparation of an Initial Study for a private project, the Lead Agency may consult with the applicant to determine if the applicant is willing to modify the project to reduce or avoid the significant effects identified in the Initial Study.

This Initial Study is organized into six sections as follows:

Introduction: This Section provides introductory information such as the Project title, the Project Applicant, and the lead agency for the Proposed Project.

Project Description: This Section provides a detailed description of the Proposed Project including the environmental setting, Project characteristics, related Project information, Project objectives, and environmental clearance requirements.

Initial Study Checklist: This Section contains the completed IS Checklist showing the significance level under each environmental impact category.

Environmental Impact Analysis: This Section contains an assessment and discussion of impacts for each environmental issue identified in the Initial Study Checklist. Where the evaluation identifies potentially significant effects, mitigation measures are provided to reduce such impacts to less-than-significant levels.

Preparers of the Initial Study and Persons Consulted: This Section provides a list of consultant team members and governmental agencies that participated in the preparation of the IS.

Acronyms and Abbreviations: This Section includes various documents and information used and referenced during the preparation of the IS, along with a list of commonly used acronyms.

A "Mitigated Negative Declaration" is prepared for a project when the initial study has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment. As shown in the following environmental analysis contained in this Initial Study, the Del Rey Pointe Residential Project involves some potentially significant effects on the environment, but these potential effects may be reduced to less-than-significant effects by project revisions in the form of mitigation measures. With regard to some other impacts, the Initial Study shows that no substantial evidence indicates that the project would have a significant environmental effect. Consequently, this Initial Study concludes that an MND shall be prepared for the proposed project.

II. PROJECT DESCRIPTION

PROJECT LOCATION

Project Site

The Project Site is located on a peninsula in the Palms - Mar Vista - Del Rey Community Plan Area of the City of Los Angeles. The triangular-shaped peninsula is bounded by the confluence of Ballona Creek to the north, Centinela Creek to the south, and vacant land to the east. The State Route 90 Marina Freeway (SR 90 Freeway) is adjacent to the Site to the northeast (see **Figure II-1, Regional and Project Vicinity Map**). Currently the Project Site is vacant with the exception of a few shipping containers, and is sparsely vegetated with largely ruderal, non-native flora, including 41 non-native non-protected trees.[1]

The Site is currently zoned [T][Q]M2-1 and designated for Light Industrial land uses by the Palms – Mar Vista – Del Rey Community Plan. The proposed Project includes a General Plan Amendment and Vesting Zone Change from [T][Q]M2-1 (Light Industrial) to [T][Q]R4-1 (High Medium Residential). The Q Conditions were established by Ordinance No. 172,217 for previous entitlement Case Nos. CPC-97-416-HD and CPC-97-407-ZC-GPA, and include limitations on height to 45 feet, floor area to 90,000 square feet, and requirements on maintenance, trash and storage, in addition to other conditions related to environmental, public facilities, archaeology, and paleontology. The Community Plan Footnote No. 1 restricts the site to Height District No. 1.

Given its proximity to SR 90 Freeway, the Project Site is subject to the *Zoning Information (Z.I.) No. 2427 Freeway Adjacent Advisory Notice for Sensitive Uses.* The Project Site is also within an Airport Hazard Zone (250 foot height limit above elevation 126), a Methane Zone, an area subject to liquefaction, and a Tsunami Inundation Zone. The Project Site is not located within a Coastal Zone, Special Grading Area, or Hillside Area.

The Project Site will be accessed via a private street and vehicular traffic bridge from Beethoven Street and Jefferson Boulevard to the south. Regional access to the Project Site is provided by SR 90 Freeway, which is immediately adjacent to the Site, and the San Diego Freeway (I-405), which is approximately 1.5 miles east of the Site. The Project area is served by local bus lines with bus stops within one-half mile along Jefferson Boulevard to the south and Culver Boulevard to the

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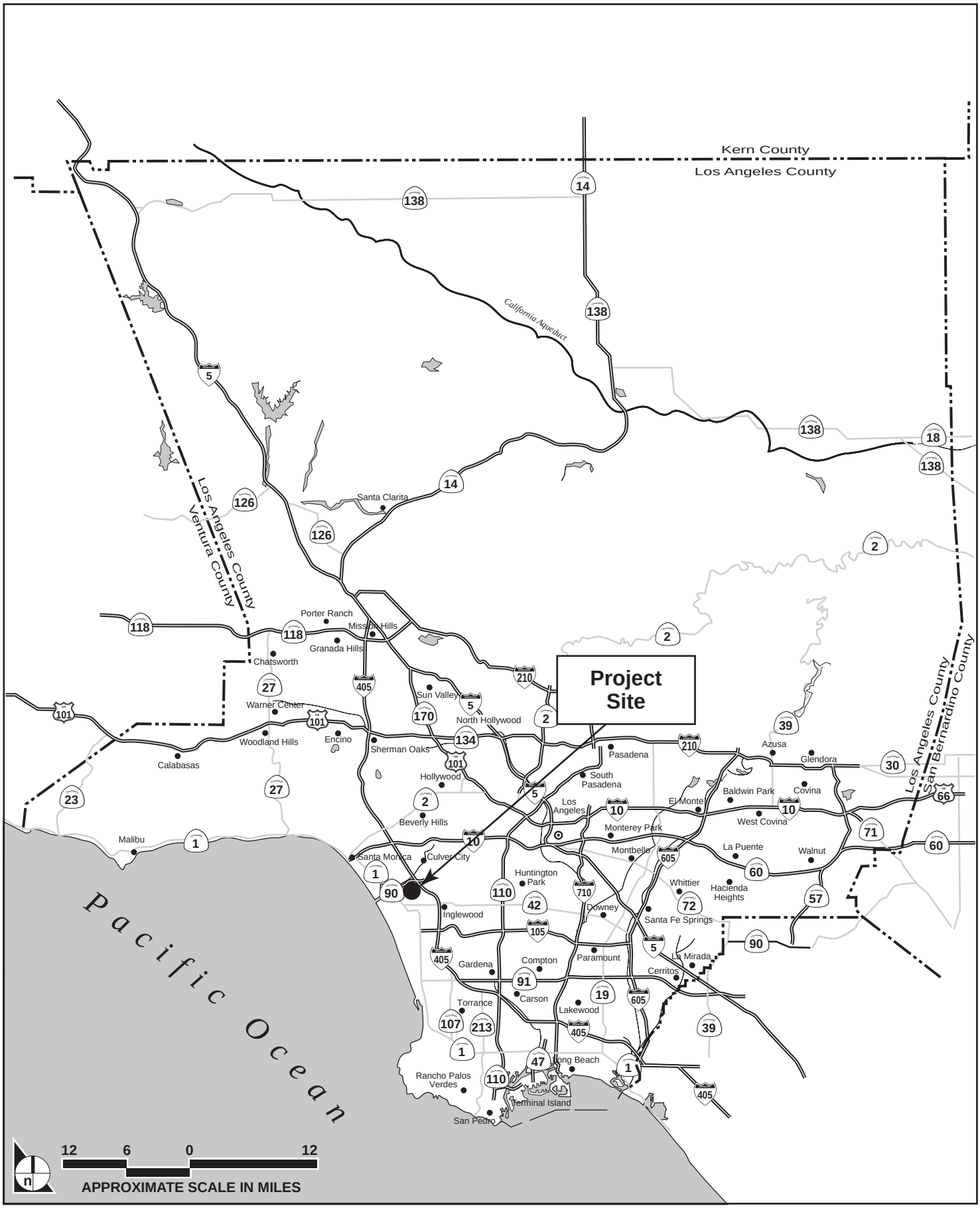
[1] *Arborist Report for 5000 Beethoven Street, prepared by William R. McKinley, Consulting Arborist, dated May 12, 2016, included as Appendix B-3 of this Initial Study.*

north, including the Los Angeles County Metropolitan Transportation Authority [Metro] (routes 108 and 110), Culver CityBus (routes 4 and 7) and the Los Angeles Department of Transportation (LADOT) (Commuter Express route 437), however it is not within a transit priority area.

Surrounding Land Uses

The triangular-shaped peninsula is bounded by the confluence of Ballona Creek to the north, Centinela Creek to the south, and vacant land to the east. The Ballona Creek Bike Path also runs along the north side of the Ballona Creek. Portions of the creek are zoned A1-1, A1-1XL, and OS-1XL and designated for Open Space and High Medium Residential land uses. The SR 90 Freeway is adjacent to the Site to the northeast and is zoned PF-1XL and designated for Public Facility – Freeway land uses. The vacant land to the east is zoned R3(PV) and R4(PV)-10 and designated for Medium and High Medium Residential land uses. Properties further north of the SR 90 Freeway and Ballona Creek are zoned M2-1, designated for Light Manufacturing land uses, and improved with manufacturing uses. Properties approximately 400 feet to the northeast of the SR 90 Freeway are zoned R1-1, designated for Low Residential land uses, and improved with single-family residences. Properties across Centinela Creek to the south are zoned M2-1, designated for Light Manufacturing land uses, and improved with commercial buildings, manufacturing, and associated parking. The nearest adjacent structures are office and industrial uses approximately 100 feet to the south (up to 4 stories in height) and 400 feet to the north (1 story in height), and single-family residences approximately 400 feet to the northeast (up to 2 stories in height). The Westside Neighborhood School and Animo Westside Charter Middle School are located approximately 430 and 1,300 feet to the south of the site, respectively. Approximately 1,500 feet to the south of the site is Jefferson Boulevard, which adjoins the Playa Vista community on C2(PV) and R4(PV) zoned lots that are designated for Regional Mixed Commercial and High Medium Residential land uses and improved with multi-family buildings up to five (5) stories in height.



SOURCE: Impact Sciences, Inc., 2017

FIGURE **II-1**

IMPACT SCIENCES

Regional and Project Vicinity Map

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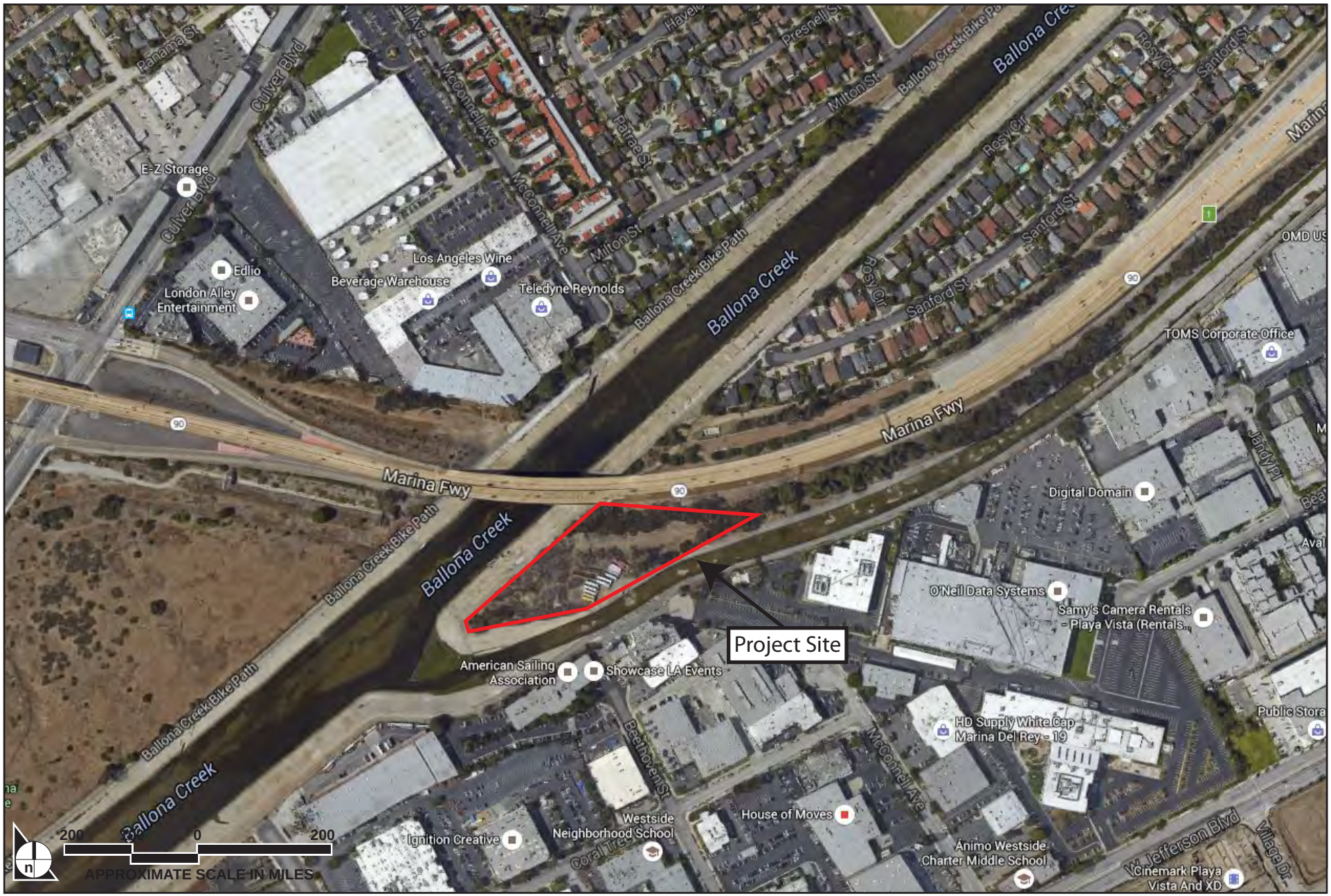


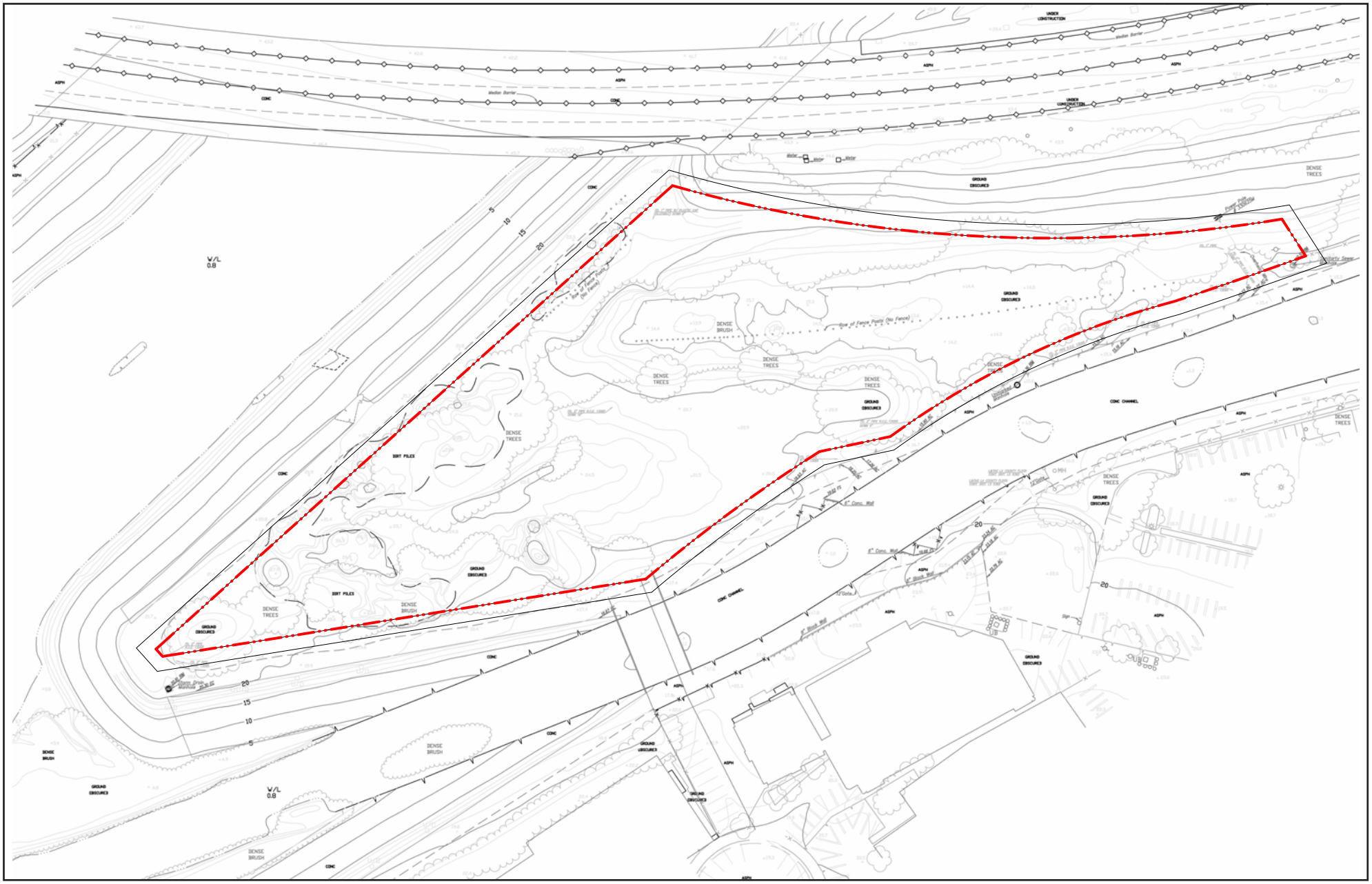
SOURCE: Google Earth, 2017

FIGURE II-2

IMPACT SCIENCES

Aerial View of the Project Site

1262.01•07/17



SOURCE: The Albert Group, 2017

FIGURE **II-3**

IMPACT SCIENCES

Survey-Existing Site Conditions

1262.001•07/17

Project Characteristics

The Del Rey Pointe Residential Project ("Proposed Project") is a multi-family residential project consisting of 236 residential apartment units and residential amenities (including a community room and business center, a gym/spa and a pool and patio area), with a total of 406 parking spaces, provided in one level of subterranean parking, one level of semi-subterranean parking, and on-grade parking. Of the 236 dwelling units, five percent (12 units) will be set aside for Extremely Low Income and 11 percent (26 units) will be set aside for Very Low Income Housing, for a total of 38 affordable units in compliance with Ballot Measure JJJ. The proposed Project would also provide 276 bicycle parking spaces (36 short-term and 240 long-term). The Project would be six (6) stories and up to 56 feet in height, with a total gross building area of 235,000 sf for a Floor Area Ratio (FAR) of 1.93:1.

Vehicular access to the Project Site would be provided via a private street and a private traffic bridge over Centinela Creek to the south (granted by means of an easement with the County of Los Angeles). In addition, a pedestrian/bicycle bridge is proposed to connect the existing Ballona Creek Bike Path on the north to the subject site and proposed vehicular bridge to the south.

The project involves excavation to approximately 16 feet below ground surface and the export of approximately 31,430 cubic yards of soil, as well as the removal of one (1) non-protected on-site tree. The project also involves the extension of utilities and other infrastructure including roads, sewer, storm drains, etc. to serve the subject site.

The residential component would consist of 40 studio, 111 one-bedroom, 81 two-bedroom, and four (4) three-bedroom units. In compliance with Ballot Measure JJJ, a total of thirty-eight (38) units would be set aside as affordable housing; five percent (12 units) will be reserved for Extremely Low Income tenants and 11 percent (26 units) for Very Low Income tenants. The proposed Project would provide amenities for Project residents including, but not limited to, a rooftop pool and spa area, a fitness room, a recreation and community room, a media-screening room/community theater, a business/conference center and wine storage locker. The perimeter of the Project Site would be circled by a pedestrian/bicycle pathway. Two portions of land on the eastern and western ends of the Project Site, 6,576 square feet and 2,522 square feet, respectively, would be permanently set-aside as a natural habitat preserve, for a total approximately 9,098 square feet. The landscaping for the 2,522 square foot Natural Habitat Preserve will be low growing shrubs and ground cover that support the bird and wildlife species and are native plant species to the area. The east facing area will set aside 6,576 square feet for a Natural Tree Habitat Preserve. This area will be improved with trees that are native to the area to support the nesting

of raptors (birds of prey) that hunt and feed. Plans for this area are still in development, however plantings could include white alder (*Alnus rhombifolia*), western sycamore (*Platanus racemosa*), Fremont cottonwood (*Populus fremontii*), and Bishop pine (*Pinus muricata*).

Design and Architectural Features

The proposed new residential buildings would be designed in contemporary, terraced vernacular, including the use of balconies, and roofs with large overhangs; varied architectural finishes, including wood rainscreen veneers and stucco would be incorporated to add visual interest. The massing of the proposed Project would be broken up with multiple buildings and courtyards that reach into the core of the Project Site. Landscaping and new trees would be provided throughout the entire Project Site. Building signage would be minimal, limited to small scale signage for wayfinding purposes. Security lighting would be provided that is dark sky compliant to reduce light pollution. Utilities at ground level and on the roof would be screened appropriately. The architectural façades of the new buildings would be surfaced with wood rainscreen paneling or painted in a variety of earth-tones, and would not include the use of materials that are highly reflective. Prior to the issuance of a building permit, the type or categories of all exterior glass and architectural features on the building façades and rooftops would be submitted for review to the Department of Building and Safety to ensure that highly reflective materials are not utilized.

Multi-Family Units

The proposed 236 residential units would consist of a mix of 40 studio, 111 one-bedroom, 81 two-bedroom, and four (4) three-bedroom apartments. Units would range in size from 671 to 2,203 square feet of livable area. The units would be offered in six plan types. **Figures II-16 and II-17, Typical Project Floor Plans,** illustrates the unit types included as part of the proposed Project, living square footage, and number of bedrooms. Twelve (12) units would be reserved for Extremely Low Income households and 26 units would be reserved for Very Low Income households in compliance with Ballot Measure JJJ. The proposed Project would contribute to the City's housing stock consistent with the Mayor's Executive Directive No. 13 and the 2014-2021 Regional Housing Needs Assessment (RHNA).

Residential access would be from the proposed two-lane vehicular access bridge and private street across Centinela Creek to connect to Beethoven Street to the south. The bridge would also provide a bike lane and pedestrian sidewalk. A drop-off and pick-up area for residents and their guests would be located in a motor court provided at the northern end of the bridge, which would

also serve as the entry way to the two-way ingress/egress point to access the parking garage. In addition, the Project would provide 36 short-term bicycle parking spaces, and 240 long-term bicycle parking spaces (on the plaza level and parking garage level one), per City Ordinance 182,386. The project will provide a private shuttle for public transportation to Del Rey, Marina Del Rey and the Playa Vista areas for community transportation to work, shops and social events. The shuttle daily schedule will be posted and available in the office of the building. A Transportation Concierge, who will coordinate ride share, car rentals, Lyft, Uber, Taxi, bicycle and information for all local and public transportation will also be provided in the building office. A ten-foot-wide pedestrian and bicycle pathway would be provided around the perimeter of the site.

Open Space

The Los Angeles Municipal Code ("LAMC") Section 12.21.G requires the Proposed Project to provide 25,925 square feet of open space. The proposed Project would include approximately 8,850 square feet of private open space in the form of private balconies, with common open space amenities including portions of the linear park and green belt, gym, and swimming pool area (refer to **Figure II-18, Open Space Plan and Calculations**).

Approximately 47,210 square feet of the total Site would be set-aside for public benefit, including two wildlife sanctuary areas (totaling 9,098 square feet), bicycle and pedestrian pathways (14,416 square feet), and green belt with two linear parks (23,696 square feet). Pedestrian improvements would include decorative paving and planters, the entry and central plazas would feature a variety of flowering trees and shrubs, in addition to a sculptural water feature. Outdoor walkways, benches and informal seating areas, and bridges connecting the residential units would be provided. A bikeway, sidewalks, landscaping planters and new trees would be provided around the perimeter of the entire Project Site.

Residential Amenities

Approximately 6,268 square feet of residential community amenity uses would be dedicated to the sole use of the residents; these amenities would include a business center, community room, gym/fitness room, and a pool area.

Natural Habitat Preserve

The west facing area of the site is on the confluence of the Ballona and Centinela Creek. There is an existing natural marsh area that has formed in the area of the Creeks confluence in the Flood Control Channels. The marsh area is not on the subject site and/or part of the project. The project would provide a buffer preserve which will be a non-build and no-pedestrian activity set aside area. The landscape for the Natural Habitat Preserve will be low growing shrubs and ground cover that support the bird and wildlife species and are native plant species to the area. The east facing area will be set aside as a Natural Tree Habitat Preserve. This area will be improved with trees that are native to the area to support the nesting of birds of prey that hunt and feed in the Project vicinity.

Vehicular Bridge and Private Street

Vehicular access to the Project Site would be provided via a private street and a private traffic bridge over Centinela Creek to the south, granted by means of an existing easement with the County of Los Angeles Flood Control District (LAFCD) along with a bridge permit issued by the LAFCD, and including a review by the US Army Corps of Engineers (USACE)[2]. The bridge would be a single span steel bridge resting on a steel reinforced concrete pile abutment system that would lie within the LAFCD rights-of-way (refer to **Figure II-19, Vehicular Bridge Location and Plan**). No structure would be constructed within the channel that would impact its integrity, including that of the channel walls. The bridge would be accessed via a private street at the west end of Beethoven Street (a public street), proceed west through 5300 Beethoven Street (under the same ownership as the subject site), cross over the aforementioned bridge, and end in a hammerhead located within the 5000 Beethoven Street property boundary. Egress from the Project Site would follow a similar route – vehicles would enter the bridge via the hammerhead within the property, and exit southbound onto Beethoven Street. The plans were previously approved by USACE under EE98-86a and LAFCD Permit No. 99047-A (**Appendix I**).

All construction of the private traffic bridge shall conform to the standard specifications for public works bridge construction including, but not limited to:

- The contractor shall field verify design elevations prior to construction

[2] The Access Bridge has been granted Approval from the United States Army Corp of Engineers ("USACE"), Permission Instrument Number SPL-408-2016-015, provided in Appendix I.

- The work shown on require the prime contractor to have a valid "A" license issued by the state of California
- The contractor shall assume sole and complete responsibility for the job Site conditions, including safety of all persons and property. During the course of construction of this Project, this requirement shall apply continuously and shall not be limited to normal working hours
- Prior to construction, the contractor shall verify all join conditions for grading, drainage, and underground facilities at crossings with proposed underground facilities. If conditions differ from those shown initially on the plans, the contractor shall notify the engineer and shall not begin construction until the changed conditions have been evaluated.
- All drawings are considered to be a part of the contract documents. The contractor shall be responsible for the review and coordination of all drawings and specifications prior to the start of construction so that a clarification can be issued.
- The contractor shall be obtain a permit from the California Division of Occupational Safety and Health (DOSH), better known as Cal/OSHA, prior to the construction of trenches or excavations which are five feet or deeper.

The Project Applicant has completed the necessary environmental documentation, permitting processes, and fees for the construction of the bridge (included in **Appendix I**), and would comply with all stipulations set forth by the City prior and during construction.

Starting from the existing Beethoven Street cul-de-sac the private street will consist of a 20′ paved surface with 6″ curb on both sides and a 10′ sidewalk on the south side only. As the private street approaches and crosses the bridge the paved surface will remain 20′ wide but the sidewalk will narrow to 7′. This narrowed section is required to cross the 28′ wide bridge. Once across the bridge the private street will open up into a hammerhead to allow turn-around movement. The sidewalk will separate from the curb and head south to loop around the proposed development. Additionally, there will be stop signs and a cross walk at the end of the bridge to allow the sidewalk to head north and connect to the sidewalk loop around the proposed development. The private street is shown in **Figure II-21 Private Street Plans**.

Bicycle and Pedestrian Bridge

Bicycle and pedestrian access to the Project Site is proposed to be provided via a private bridge over Ballona Creek and connect to the existing Ballona Creek Bike Path to the north, granted by means of an easement with the property owner on the northern embankment, the LAFCD and the USACE. Plans for the design of bridge would be developed in collaboration with the property owner on the northern embankment, LAFCD and USACE, and would meet all LAFCD and USACE requirements. No structure would be constructed within the channel that would impact its integrity, including that of the channel walls. In addition, the proposed bicycle and pedestrian bridge would adhere to the design guidelines provided in the '**Advisory Notice Relative to Pedestrian Bridges and Tunnels'** issued by the City Planning Commission on October 27, 2016.

Utilities

Drainage from the site will either cross over the Centinela Creek flood control channel and on the surface of the proposed bridge or under the proposed bridge via a private storm drain pipe, draining into a proposed catch basin at the east end of the private street before the drainage goes into the public street portion of Beethoven Street. The proposed storm drain will be a part of the private street and will connect to an existing 66″ pipe, which outlets into Centinela Creek.

Proposed utilities servicing the proposed development will follow the private street alignment and proposed bridge. The proposed utilities might include but are not limited to LADWP Water, LADWP Power conduits, gas, telephone, fiber optics, cable, private water and a private force main storm drain.

The project is proposing a connection to an existing 27″ sewer main line in the old McConnell Avenue right-of-way on the east side of the project. According to the City of Los Angeles Bureau of Engineering (BOE) it will be acceptable to connect to that existing 27″ sewer pipe. The existing 27″ sewer pipe is approximately 8′ below sea level and is approximately 25 feet deep. A new 12″ sewer lateral will need to be constructed from the existing 27″ sewer main to the property (approximately 40 feet). The new connection will connect to the existing 27″ from the top via a chimney connection.

Prior to bridge construction, runoff from the site and any dewatering will be collected and treated per the appropriate construction Best Management Practices. The treated runoff will then be pumped, via a temporary surface pipe or hose, to the existing storm drain in Centinela Avenue. The pipe or hose will be set along the northerly edge of the existing service road along the north side of Centinela Creek. The distance to the existing storm drain is on the order of 3000 feet. The flowrate and pressure needed to overcome this distance suggests the use of large temporary pumps.

After bridge construction, a permanent pump station will be constructed with a force main attached to the upstream side of the bridge and continuing toward Beethoven Street. Flowing toward Centinela Creek in Beethoven Street is an existing 66-inch storm drain constructed under plan D-21505. The force main will empty in to this storm drain at a point acceptable to the City of Los Angeles. Additional property BMP's will be constructed per the City of Los Angeles's MS4 permit. At this time a pretreatment device, such as a CDS unit, and large cisterns to capture and use the rain water for irrigation are the proposed permanent BMPs.

Green Building and Sustainability

The Proposed Project concentrates new multi-family residential development on a vacant and unimproved site with limited infrastructure. The site is adjacent to an urbanized neighborhood that is served by bus lines operated by Metro, LADOT, Santa Monica, and Culver City bus lines. Local bus routes with bus stops in a half-mile radius include Metro routes 108, 110, and 358, Santa Monica Big Blue Bus route 3/R3, Culver CityBus routes 2 and 6/R6, and LADOT Commuter Express route 574. The site is not within a transit priority area.

The proposed Project would also support the development of a multi-modal transportation system and promote regional mobility goals to reduce vehicle trips and infrastructure costs by committing to a Transportation Demand Management (TDM) Program that would include:

- A privately funded fixed route shuttle that would provide drop off and pick up service to nearby transit stations, entertainment and work centers;
- An on-Site Transit Plaza feature, to facilitate access to public transportation for both residents and visitors, featuring a centralized rideshare (i.e. Uber and Lyft) pick up and drop off location, and zip cars;
- Electric vehicle (EV) charging stations for use by visitors and residents;
- Carpool and ride-share notices and postings;

- A satellite remote work center for residents who wish to telecommute to work; and
- Ample short and long term bicycle parking.

CALGreen Building Code

The 2016 California Green Building Standards Code (*CAL*Green), set forth in Part 11 of Title 24 of the California Code of Regulations, became effective on January 1, 2017. *CAL*Green sets minimum standards that all new structures must meet to minimize significantly the state's overall carbon output. Local jurisdictions retain the administrative authority to exceed the new *CAL*Green standards.

*CAL*Green requires that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant emitting finish materials. *CAL*Green's mandatory measures establish a minimum for green construction practices, and incorporate environmentally responsible buildings into the everyday fabric of California cities without significantly driving up construction costs.

*CAL*Green also has more stringent, voluntary provisions that have been placed in the appendix for optional use. Some key mandatory measures for commercial occupancies include specified parking for clean air vehicles, a 20 percent reduction of potable water use within buildings, a 50 percent construction waste diversion from landfills, use of building finish materials that emit low levels of volatile organic compounds, and commissioning for new, nonresidential buildings over 10,000 square feet.

Key optional measures are included in a two-tiered system designed to allow jurisdictions to adopt codes that go beyond the State mandatory provisions. The non-residential tiers include increased reduction in energy usage by 15 or 30 percent and increased reduction in potable water use, parking for clean air vehicles, cool roofs, construction waste diversion, use of recycled materials, and use of low-emitting resilient flooring and thermal insulation.

The code uses the existing building code enforcement infrastructure to verify compliance. *CAL*Green measures are inspected and verified by local building departments, in this case the City of Los Angeles Department of Building and Safety, during permitting and construction.

Los Angeles Green Building Code

The City of Los Angeles implemented Ordinance No. 184,691 as the most recent update to the Los Angeles Green Building Code (LA Green Building Code). The LA Green Building Code is based on the 2016 *CAL*Green code discussed above. The following types of projects are subject to the LA Green Building Code:

- All new buildings (residential and non-residential)
- All additions (residential and non-residential)
- Alterations with building valuations over $200,000 (residential and non-residential)

Specific measures to be incorporated into the proposed Project to the extent feasible would include, but are not limited to:

- Recycling of asphalt, concrete, metal, wood and cardboard waste generated during demolition and construction;
- Installation of a "cool roof" that reflects the sun's heat and reduces urban heat island effect;
- Use of recycled construction materials, including recycled steel framing, crushed-concrete sub-base in parking lots, fly ash-based concrete and recycled content in joists and joist girders when feasible;
- Use of locally (within 500 miles) manufactured construction materials, where possible;
- Central tracking of waste compactor loads, ensuring that compactors are full thereby reducing trips to landfills;
- Use of energy efficient lighting;
- Use of ENERGY STAR(®)[3] appliances in residential units;
- Use of high energy efficiency rooftop heating and conditioning systems;
- 15% of the roof area set aside for future solar panels;

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[3] *The ENERGY STAR program, developed by the US Environmental Protection Agency in 1992, is a voluntary measure intended to reduce energy consumption and improve energy efficiency, which has resulted in appliance companies, car companies, home builders, and more stepping in to create and promote more energy efficient products. For products to be designated as ENERGY STAR they must be certified by an independent third-party to provide increased energy efficiency. If the product costs more than a similar non-ENERGY STAR product the purchaser must be able to recoup their investment through utility savings.*

- Use of ultra-low-flow toilets and low-flow metered hand-wash faucets in public facilities;
- Use of smart irrigation systems to avoid over-watering of landscape;
- Use of indigenous and/or water-appropriate plants in landscaping; and
- Use of low-impact development measures using innovative design to filter and infiltrate stormwater runoff and reduce water sent to stormdrain systems.
- Provision of electric vehicle charging stations in the parking structure; 30% of total spaces would be designated for low emitting, fuel efficient and carpool/van pool vehicles.

Security

Design Out Crime/Crime Prevention through Environmental Design

Through the City's land use and building permit process, the LAPD's Crime Prevention Unit provides guidance on design techniques for new developments to incorporate crime prevention into the development design. The techniques and process are outlined in the Design Out Crime Guidelines: Crime Prevention Through Environmental Design, and include the following basic concepts:

- Natural surveillance: The placement of physical features, activities, and people in a way that maximizes visibility.
- Natural access control: Restricting or encouraging people to come into a space through the placement of entrances, exits, fencing, landscaping, and lighting.
- Territorial reinforcement: The use of physical attributes to define ownership and separate public and private space.

The proposed Project would include installation of security and fire sprinkler alarm systems that would be connected to a UL (Underwriters Laboratories Inc.) listed 24-hour monitoring station and local police and/or fire departments.

Closed circuit television (CCTV) cameras would be mounted on the building exteriors, in the various residential lobbies at plaza level and throughout all levels of the parking garage that would record activity on the property at all times. The cameras would also be connected to a computer screen in the main lobby at the daytime concierge desk.

The main and other residential lobbies at plaza level would have intercom access/controlled access. Residential parking would be gated with intercom access/controlled (card key or 'clicker') access.

Project Design Features

PDF-SEC-1: The Project Applicant shall submit Site plans and building plans as necessary to the LAPD Crime Prevention Unit to ensure the design incorporates building design standards that enhance police protection and meet *Design Out Crime* Guidelines. The Project includes, but is not limited to, the following features:

- Natural surveillance: Physical features, activities, and people gathering areas are placed in a way that maximizes visibility.
- Mix of uses that provide good visual connection between uses, and no ambiguous unassigned spaces.
- Natural access control: Restricting or encouraging people to come into a space through the placement of entrances, exits, fencing, landscaping, and lighting, which provide nighttime vision for pedestrians, homeowners and business people to permit pedestrians to see one another.
- Clear well lit paths from the street to the development through parking and landscape areas and within the development to building entries.
- Territorial reinforcement: The establishment of the building perimeter creates physical attributes to define ownership and separate public and private spaces.

PDF-SEC-2: During construction, security measures shall be provided including security fencing, lighting, and locked entries around the construction zones.

PROJECT CONSTRUCTION

The proposed Project Site features two construction components. First, the vehicular bridge would be constructed over approximately seven to eight months (30 weeks). This bridge is to be constructed to connect Beethoven Street with the Project Site. The bridge will provide access to the Project Site for both construction and operation. Following construction of the bridge, construction of the residential units on the Project Site would begin, lasting approximately two years.

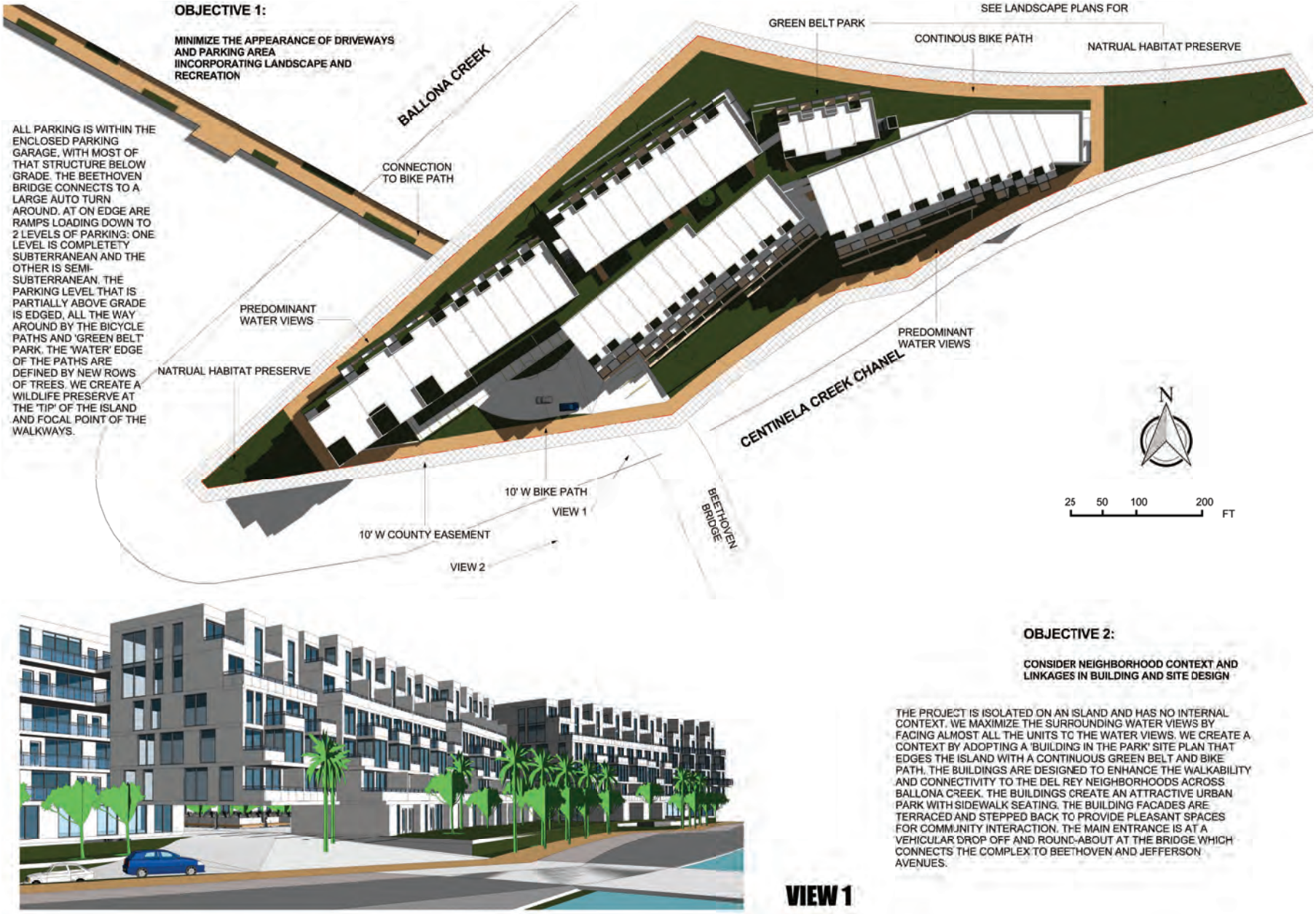
Grading and construction of the residential component of the proposed Project is estimated to take approximately 22 to 24 months; some construction activities would take place concurrently. The proposed construction sequence is anticipated as follows:

- Excavation and Site prep: 1-3 months
- Concrete footings, foundation, retaining walls, garage, slab, and elevated podium deck: 5-6 months
- Rough wood framing: 5-6 months
- Sheathing, insulation, and flashing: 2-3 months
- Roofing: 2-3 months
- Windows and openings: 2-3 months
- Exterior finish materials: 3-4 months
- Interior utility distribution: 5-6 months
- Interior partitions: 4-5 months
- Finishes, fixtures and casework: 2-3 months
- Site work and landscaping: 4-5 months

The proposed Project would require the net export of up to approximately 31,430 cubic yards of material from the Site. The proposed Project would require a haul route permit, subject to the approval of the City of Los Angeles Department of Building and Safety. The likely haul route for the Project would utilize Jefferson Boulevard to access the San Diego Freeway, with exported materials most likely disposed of at the Sunshine Canyon Landfill in Sun Valley.

Construction Parking

Construction worker parking and building material laydown during construction of the proposed Project would take place on the Project Applicant's adjacent properties located at 5297 and 5300 Beethoven Street.



SOURCE: The Albert Group, 2018

FIGURE **II-4**

IMPACT SCIENCES

Project Site Plan

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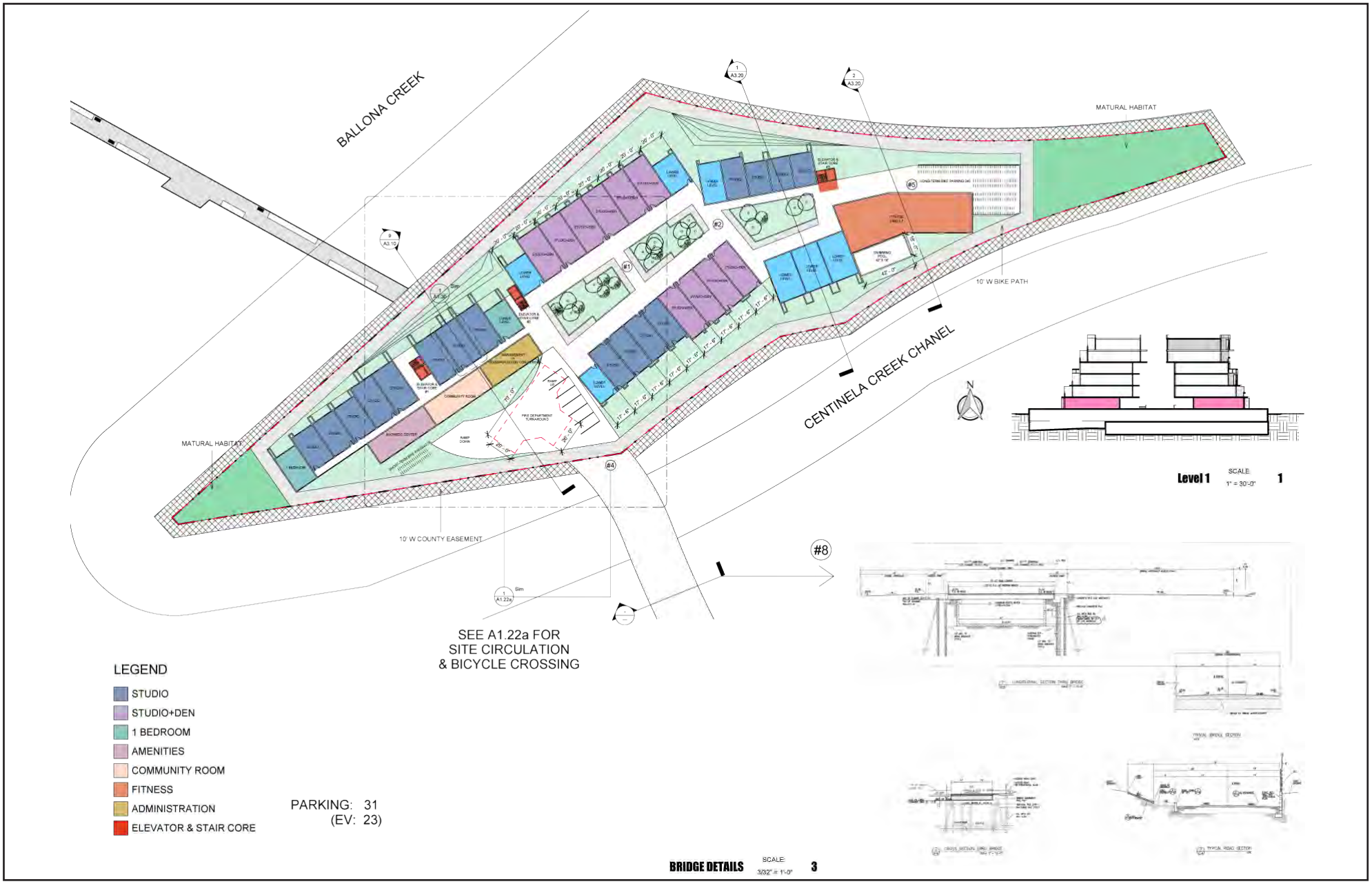

SOURCE: The Albert Group, 2018

FIGURE **II-5**

IMPACT SCIENCES

Plaza Level Site Plan

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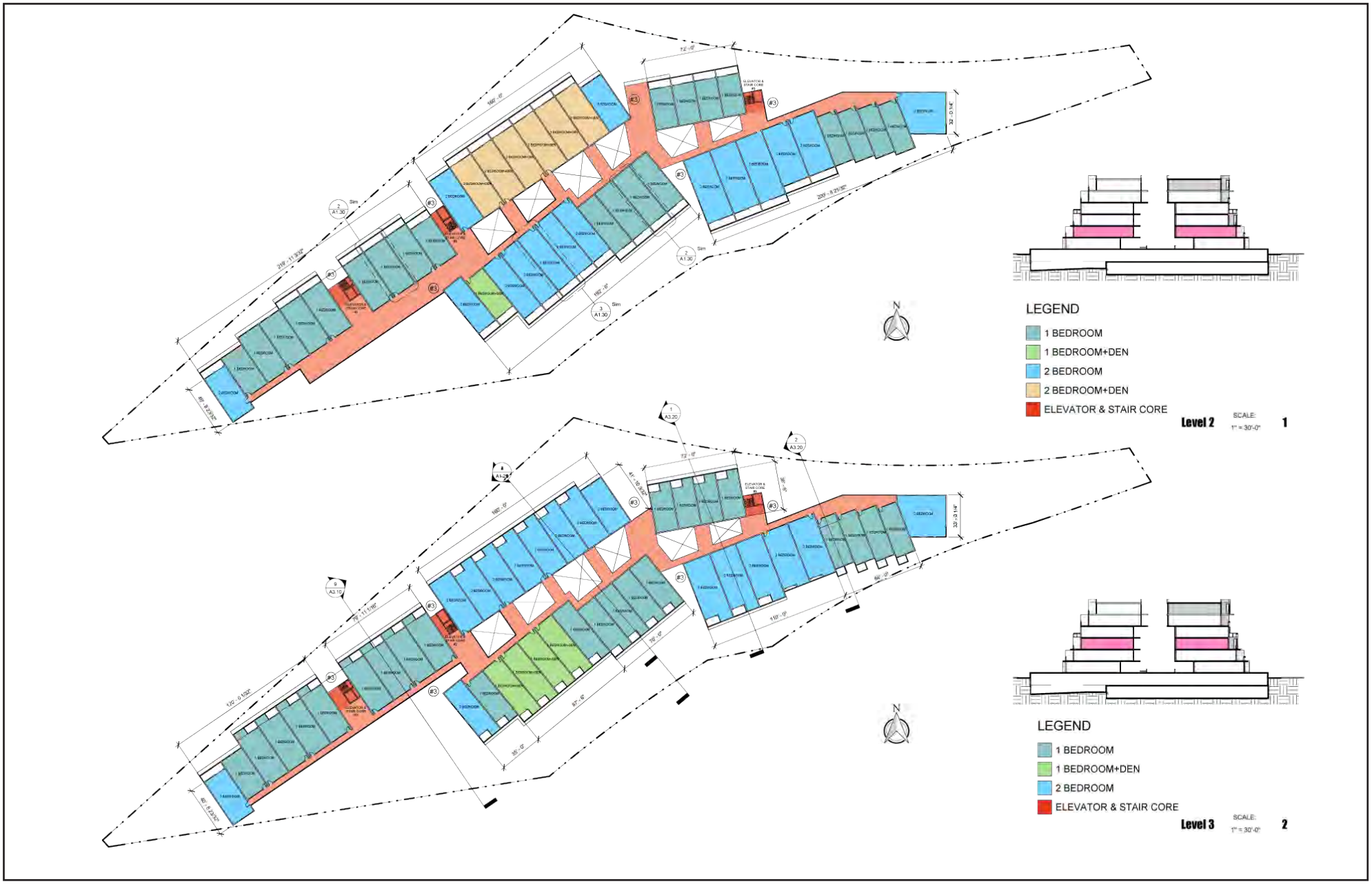

SOURCE: The Albert Group, 2018

FIGURE **II-6**

IMPACT SCIENCES

Levels 2 and 3 Site Plans

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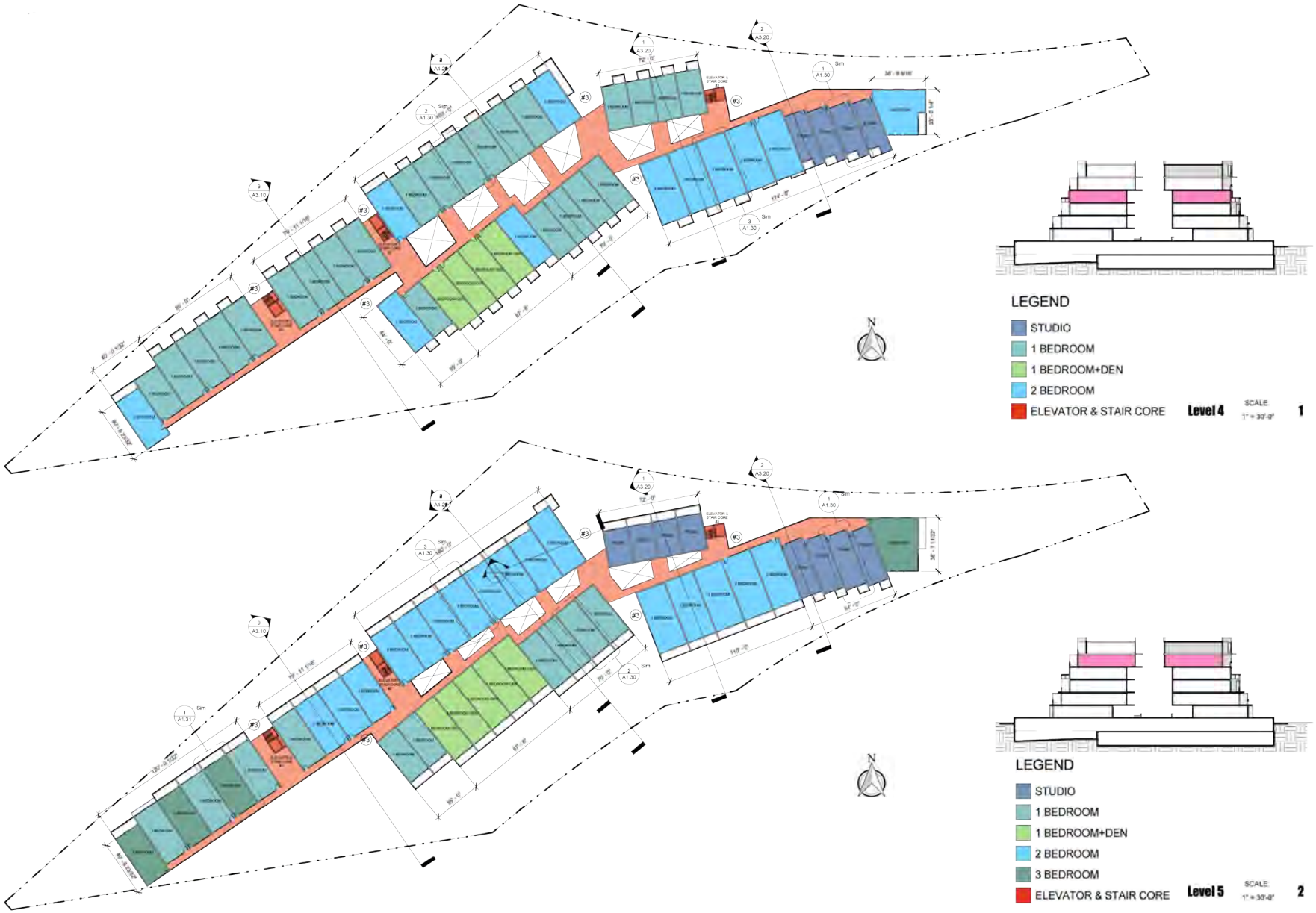

SOURCE: The Albert Group, 2018

FIGURE **II-7**

IMPACT SCIENCES

Levels 4 and 5 Site Plans

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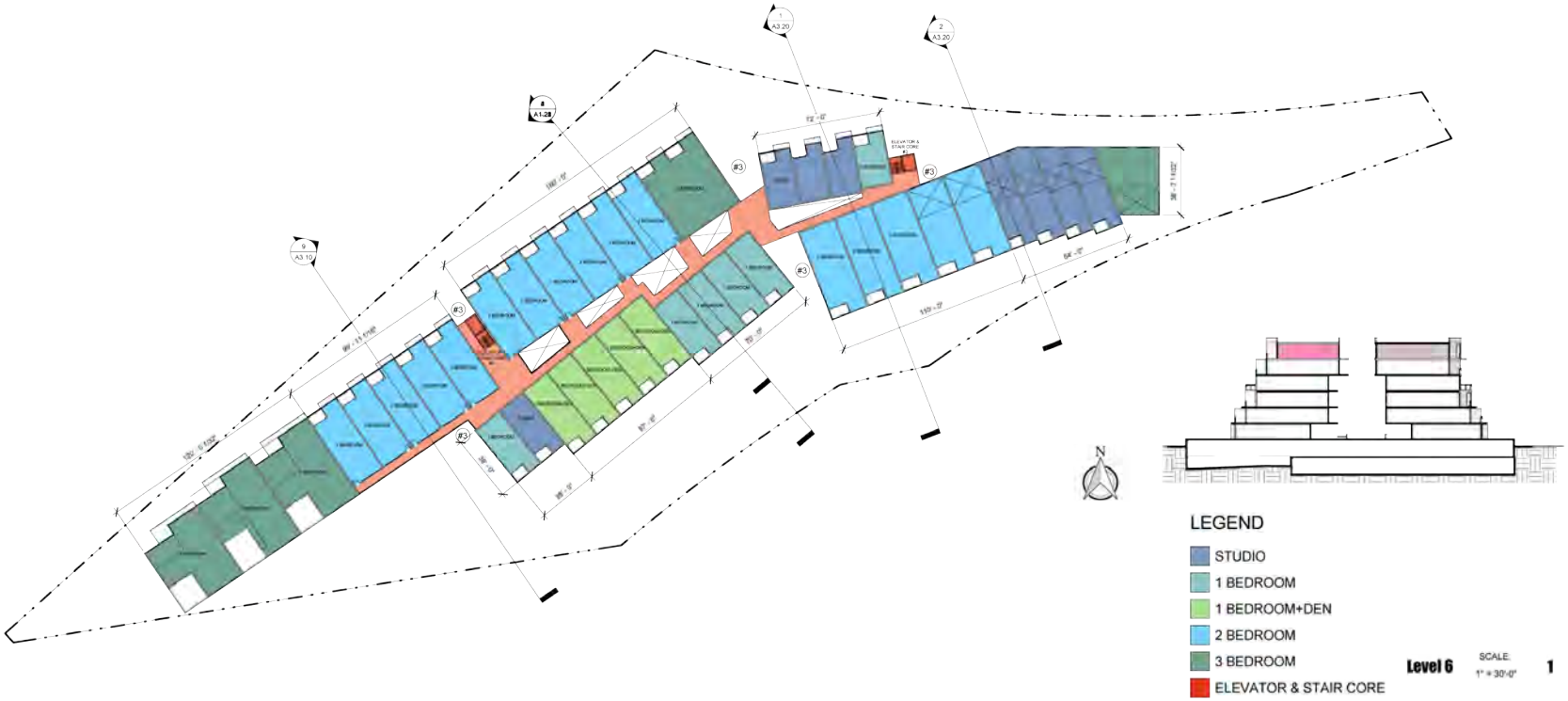

SOURCE: The Albert Group, 2018

FIGURE **II-8**

IMPACT SCIENCES

Level 6 Site Plan

1262.001•06/18

SOURCE: The Albert Group, 2018

FIGURE **II-9**

IMPACT SCIENCES

Upper and Lower Levels Parking Site Plans

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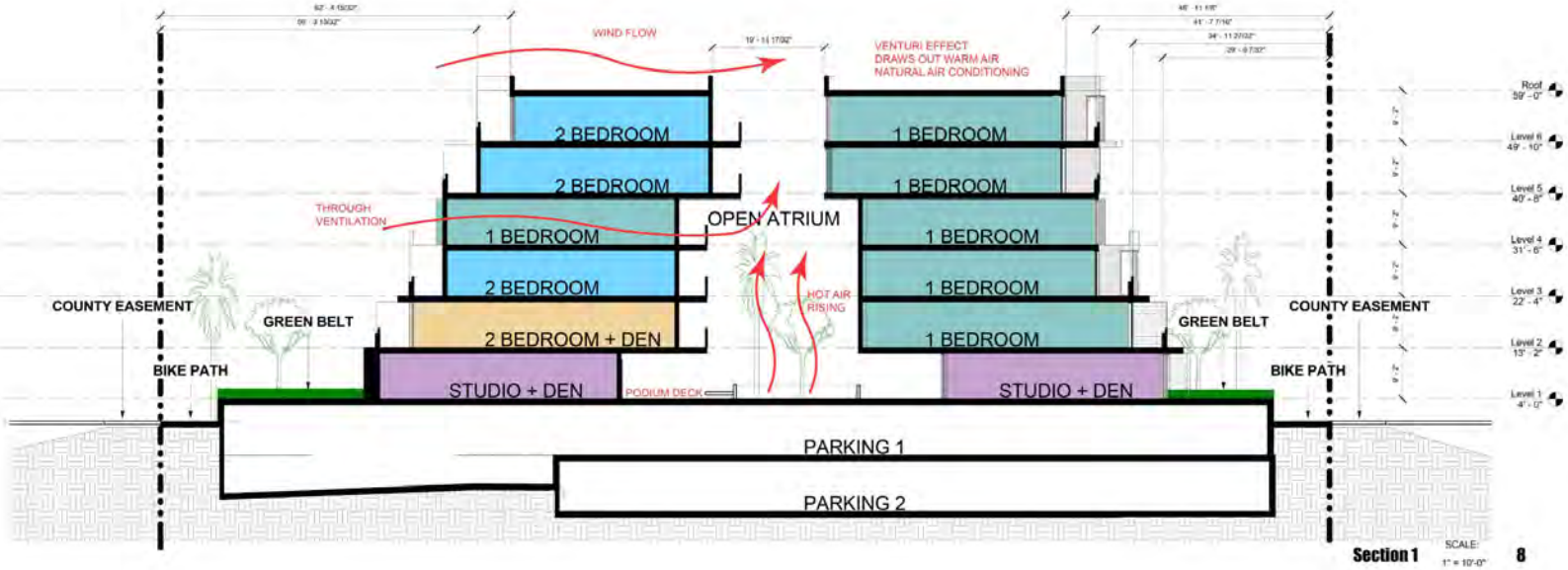

SOURCE: The Albert Group, 2018

FIGURE **II-10**

IMPACT SCIENCES

Project Sections 1 and 2

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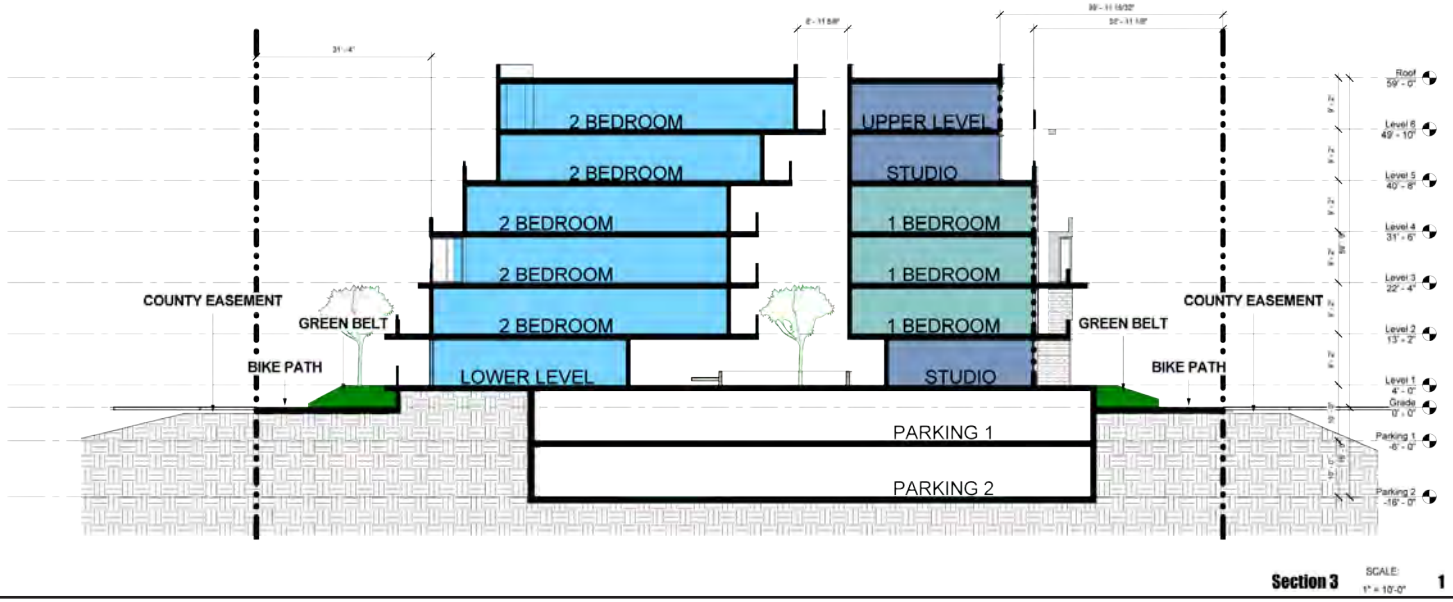

SOURCE: The Albert Group, 2018

FIGURE **II-11**

IMPACT SCIENCES

Project Sections 3 and 4

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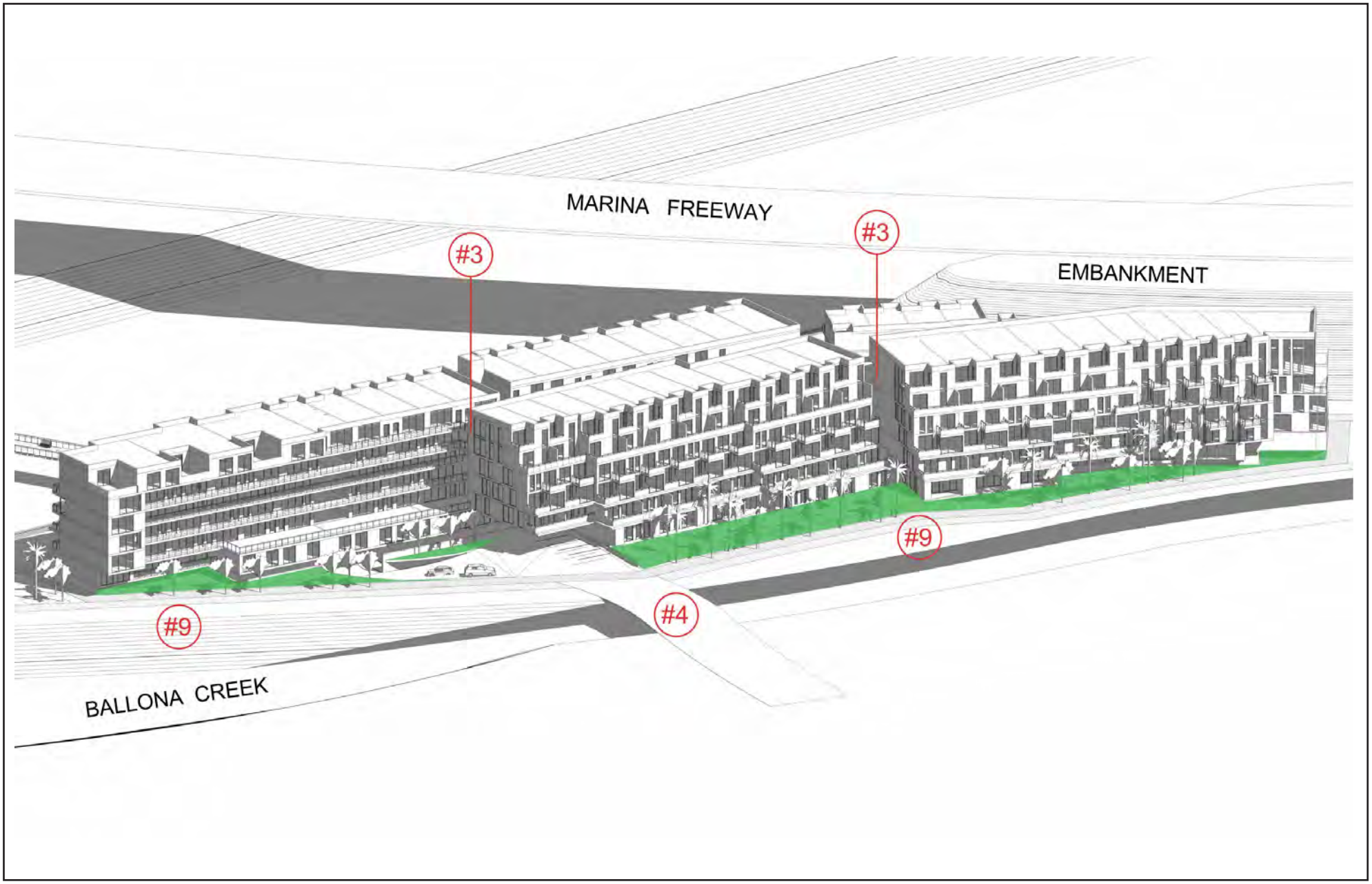

SOURCE: The Albert Group, 2018

FIGURE **II-12**

IMPACT SCIENCES

Southwest Project Elevation

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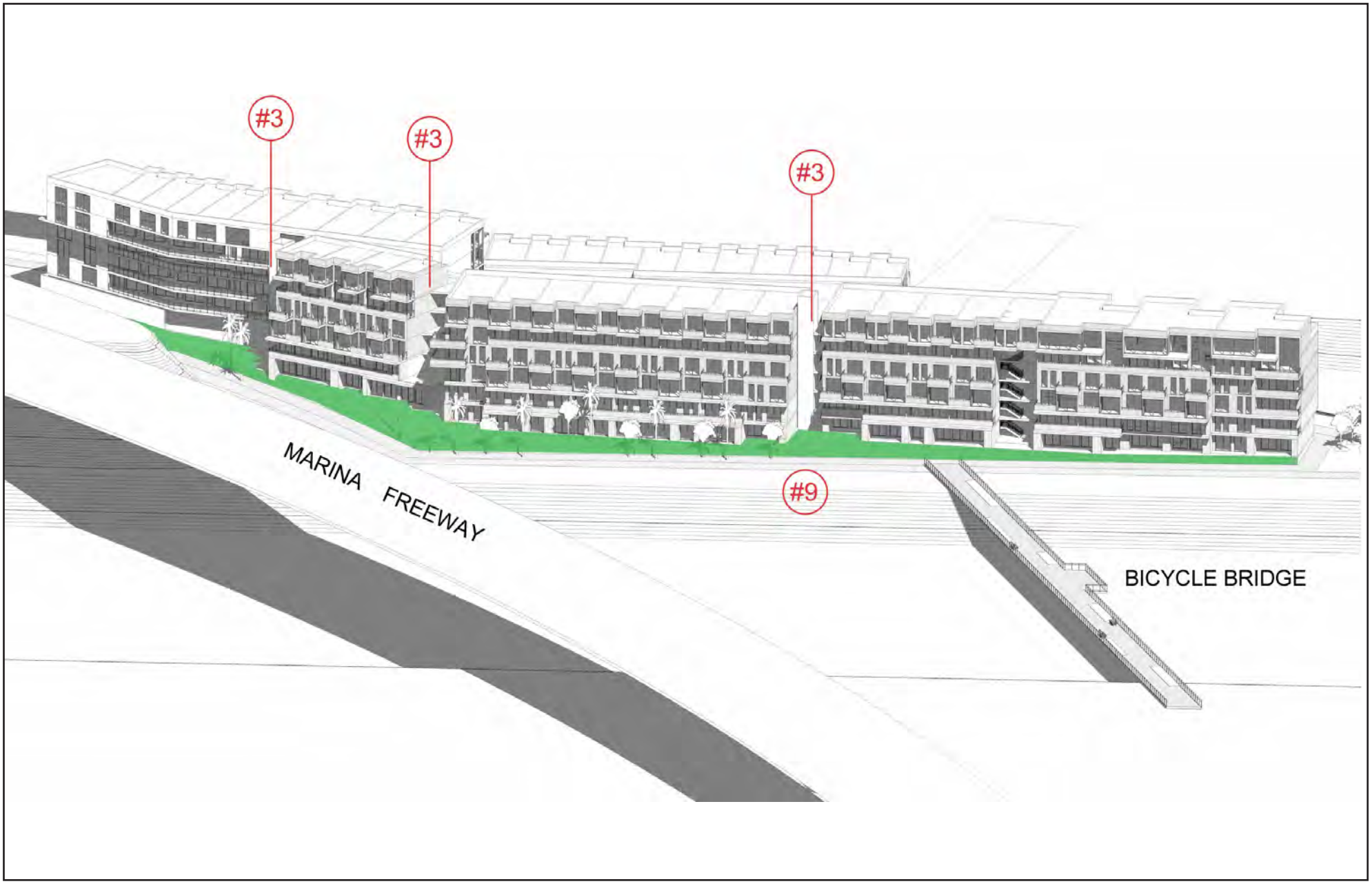

SOURCE: The Albert Group, 2018

FIGURE **II-13**

IMPACT SCIENCES

Northwest Project Elevation

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SOURCE: The Albert Group, 2018

FIGURE **II-14**

IMPACT SCIENCES

Building Elevations - South Views

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#9 LINEAR PARK

#3 VERTICAL BUILDING BREAKS

SOURCE: The Albert Group, 2018

FIGURE **II-15**

IMPACT SCIENCES

Building Elevations - North Views

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STUDIO TYPICAL SCALE: 1/4" = 1'-0" **1**

1 BEDROOM TYPICAL SCALE: 1/4" = 1'-0" **2**

2 BEDROOM TYPICAL SCALE: 1/4" = 1'-0" **3**

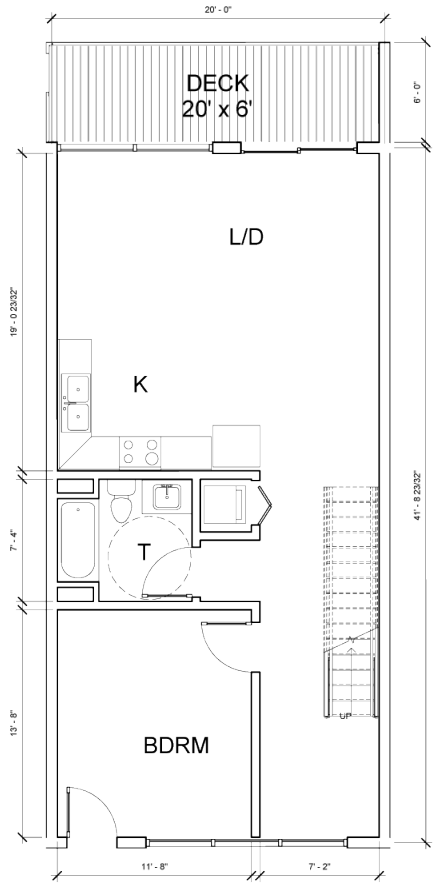
SOURCE: The Albert Group, 2018

FIGURE **II-16**

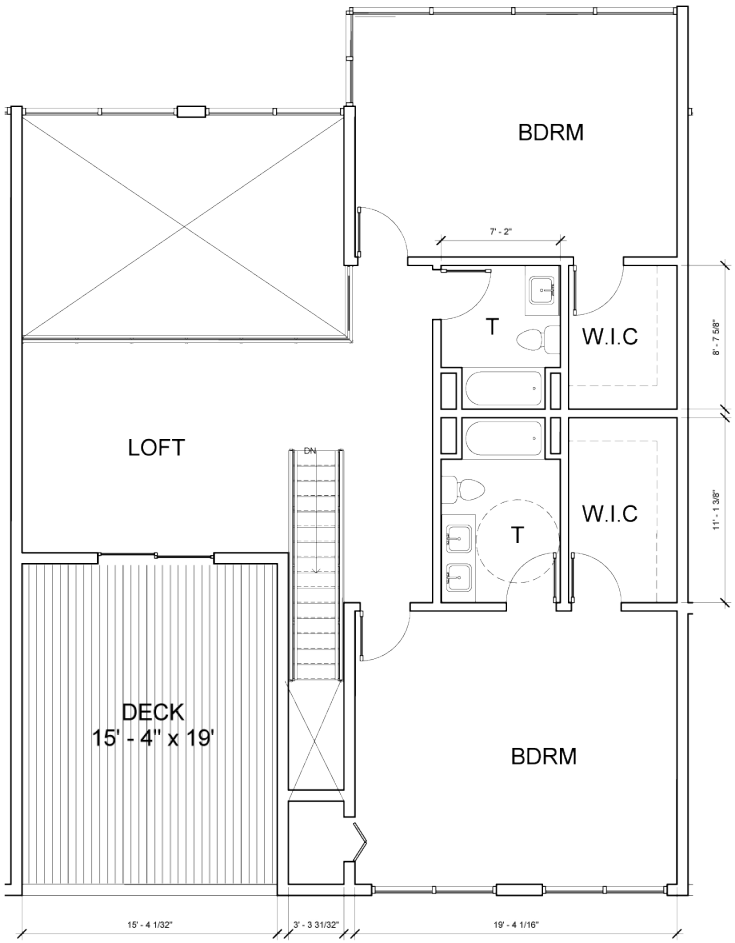
IMPACT SCIENCES

Typical Studio, 1 Bedroom and 2 Bedroom Apartment Layouts

1262.001•06/18



3 BEDRROM TYPICAL LOWER LEVEL SCALE: 1/4" = 1'-0" **1**



0 5 10 20 FT

3 BEDROOM TYPICAL UPPER LEVEL SCALE: 1/4" = 1'-0" **2**

SOURCE: The Albert Group, 2018

FIGURE **II-17**

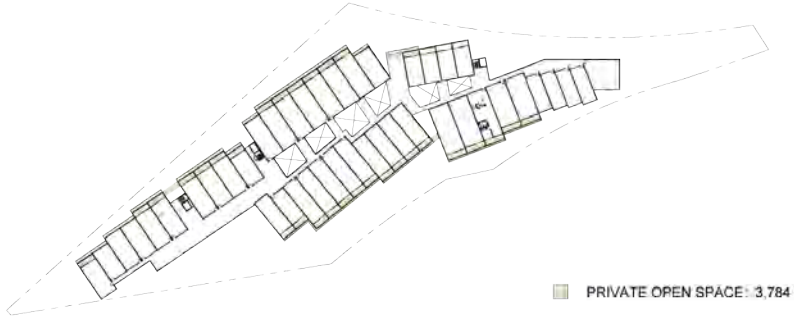
IMPACT SCIENCES

Typical 3 Bedroom Apartment Layout

1262.001•06/18

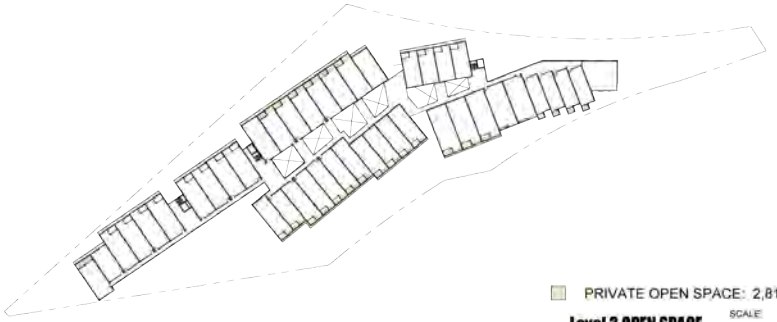
COMMON OPEN SPACE: 48,160 S.F.

Level 1 OPEN SPACE SCALE: 1" = 60'-0" **1**



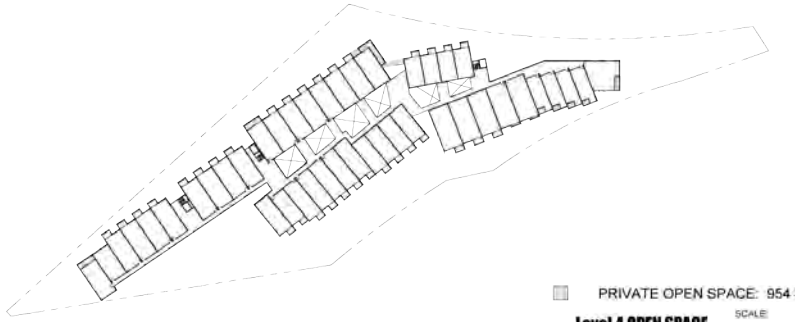
PRIVATE OPEN SPACE: 3,784 S.F.

Level 2 OPEN SPACE SCALE: 1" = 60'-0" **2**



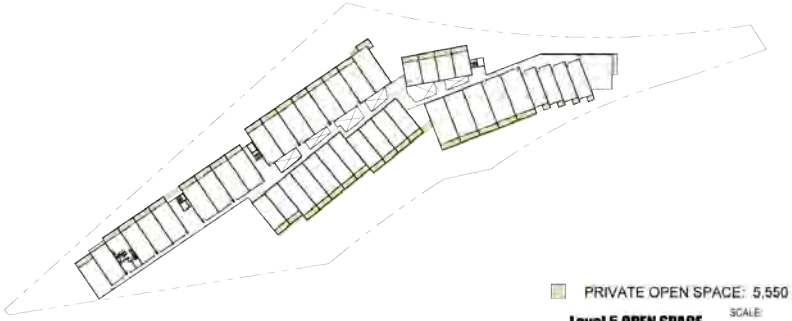
PRIVATE OPEN SPACE: 2,810 S.F.

Level 3 OPEN SPACE SCALE: 1" = 60'-0" **3**



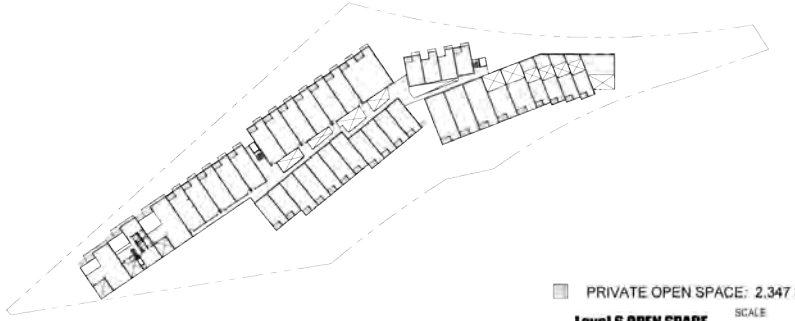
PRIVATE OPEN SPACE: 954 S.F.

Level 4 OPEN SPACE SCALE: 1" = 60'-0" **4**



PRIVATE OPEN SPACE: 5,550 S.F.

Level 5 OPEN SPACE SCALE: 1" = 60'-0" **5**



PRIVATE OPEN SPACE: 2,347 S.F.

Level 6 OPEN SPACE SCALE: 1" = 60'-0" **6**

TOTAL OPEN SPACE PROVIDED= 70,165 SF

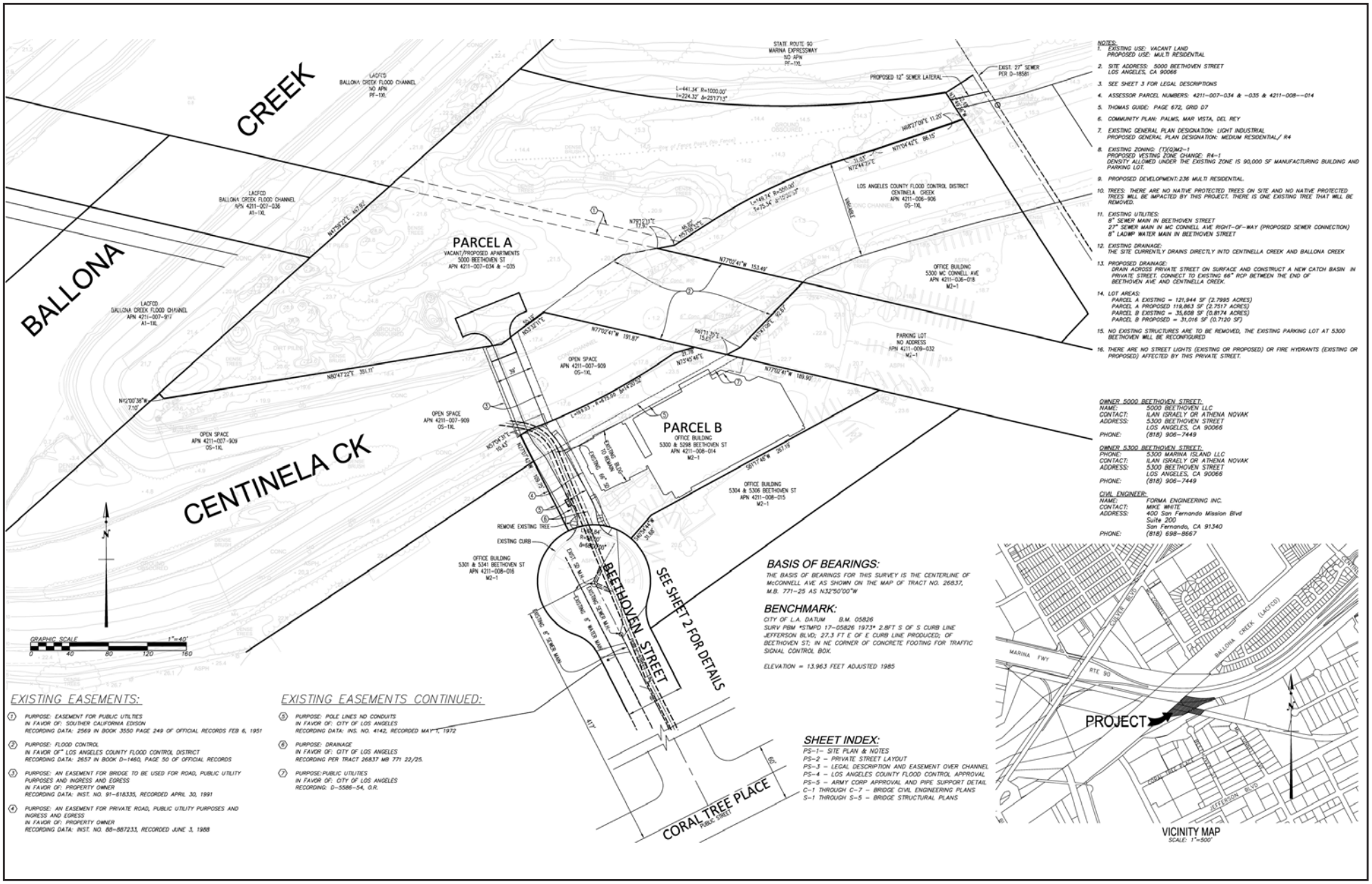
SOURCE: The Albert Group, 2018

FIGURE **II-18**

IMPACT SCIENCES

Project Open Space Plans and Calculations

1262.001•06/18



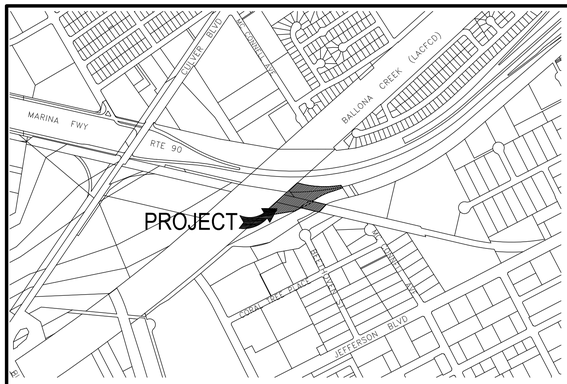
SOURCE: Forma Engineering, 2018

FIGURE **II-19**

IMPACT SCIENCES

Vehicular Bridge Location Plan

1262.001•10/18



VICINITY MAP
SCALE: 1"=600'

NOTES:

1. EXISTING USE: VACANT LAND
   PROPOSED USE: MULTI RESIDENTIAL
2. SITE ADDRESS: 5000 BEETHOVEN STREET
   LOS ANGELES, CA 90066
3. SEE SHEET 3 FOR LEGAL DESCRIPTIONS
4. ASSESSOR PARCEL NUMBERS: 4211-007-034 & -035 & 4211-008--014
5. THOMAS GUIDE: PAGE 672, GRID D7
6. COMMUNITY PLAN: PALMS, MAR VISTA, DEL REY
7. EXISTING GENERAL PLAN DESIGNATION: LIGHT INDUSTRIAL
   PROPOSED GENERAL PLAN DESIGNATION: MEDIUM RESIDENTIAL/ R4
8. EXISTING ZONING: (T)(Q)M2-1
   PROPOSED VESTING ZONE CHANGE: R4-1
   DENSITY ALLOWED UNDER THE EXISTING ZONE IS 90,000 SF MANUFACTURING BUILDING AND PARKING LOT.
9. PROPOSED DEVELOPMENT: 236 MULTI RESIDENTIAL.
10. TREES: THERE ARE NO NATIVE PROTECTED TREES ON SITE AND NO NATIVE PROTECTED TREES WILL BE IMPACTED BY THIS PROJECT. THERE IS ONE EXISTING TREE THAT WILL BE REMOVED.
11. EXISTING UTILITIES:
    8" SEWER MAIN IN BEETHOVEN STREET
    27" SEWER MAIN IN MC CONNELL AVE RIGHT-OF-WAY (PROPOSED SEWER CONNECTION)
    8" LADWP WATER MAIN IN BEETHOVEN STREET
12. EXISTING DRAINAGE:
    THE SITE CURRENTLY DRAINS DIRECTLY INTO CENTINELLA CREEK AND BALLONA CREEK
13. PROPOSED DRAINAGE:
    SITE DRAINAGE WILL BE CONDUCTED ACROSS TEH BIRDGE, UNDER THE BRIDGE, VIA A PRIVATE FROGE MAIN TO OUTLET INTO A PROPOSED CATCH BASIN. THE PROPOSED CATCH BASIN WILL BE PART OF THE PRIVATE STREET AND WILL CONNECT TO EXISTING 66" RCP BETWEEN THE END OF BEETHOVEN AVE AND CENTINELLA CREEK.
14. LOT AREAS:
    PARCEL A EXISTING = 121,944 SF (2.7995 ACRES)
    PARCEL A PROPOSED 119,863 SF (2.7517 ACRES)
    PARCEL B EXISTING = 35,608 SF (0.8174 ACRES)
    PARCEL B PROPOSED = 31,016 SF (0.7120 SF)
15. NO EXISTING STRUCTURES ARE TO BE REMOVED, THE EXISTING PARKING LOT AT 5300 BEETHOVEN WILL BE RECONFIGURED
16. THERE ARE NO STREET LIGHTS (EXISTING OR PROPOSED) OR FIRE HYDRANTS (EXISTING OR PROPOSED) AFFECTED BY THIS PRIVATE STREET.
17. PROPOSED UTILITIES:
    WATER - LADWP PUBLIC WATER OR A PRIVATE WATER LINE UNDER BRIDGE
    POWER - LADWP POWER UNDER BRIDGE
    GAS - SO. CALL. GAS UNDER BRIDGE
    SEWER - PUBLIC SEWER AT NORTHEAST CORNER OF PROPERTY, EXIST 27" SEWER MAIN.

EXISTING EASEMENTS:

(1) PURPOSE: EASEMENT FOR PUBLIC UTILTIES
IN FAVOR OF: SOUTHER CALIFORNIA EDISON
RECORDING DATA: 2569 IN BOOK 3550 PAGE 249 OF OFFICIAL RECORDS FEB 6, 1951

(2) PURPOSE: FLOOD CONTROL
IN FAVOR OF" LOS ANGELES COUNTY FLOOD CONTROL DISTRICT
RECORDING DATA: 2657 IN BOOK D-1460, PAGE 50 OF OFFICIAL RECORDS

(3) PURPOSE: AN EASEMENT FOR BRIDGE TO BE USED FOR ROAD, PUBLIC UTILITY PURPOSES AND INGRESS AND EGRESS
IN FAVOR OF: PROPERTY OWNER
RECORDING DATA: INST. NO. 91-618335, RECORDED APRIL 30, 1991

(4) PURPOSE: AN EASEMENT FOR PRIVATE ROAD, PUBLIC UTILITY PURPOSES AND INGRESS AND EGRESS
IN FAVOR OF: PROPERTY OWNER
RECORDING DATA: INST. NO. 88-887233, RECORDED JUNE 3, 1988

(5) PURPOSE: POLE LINES ND CONDUITS
IN FAVOR OF: CITY OF LOS ANGELES
RECORDING DATA: INS. NO. 4142, RECORDED MAY 1, 1972

(6) PURPOSE: DRAINAGE
IN FAVOR OF: CITY OF LOS ANGELES
RECORDING PER TRACT 26837 MB 771 22/25.

(7) PURPOSE: PUBLIC UTILITIES
IN FAVOR OF: CITY OF LOS ANGELES
RECORDING: D-5586-54, O.R.

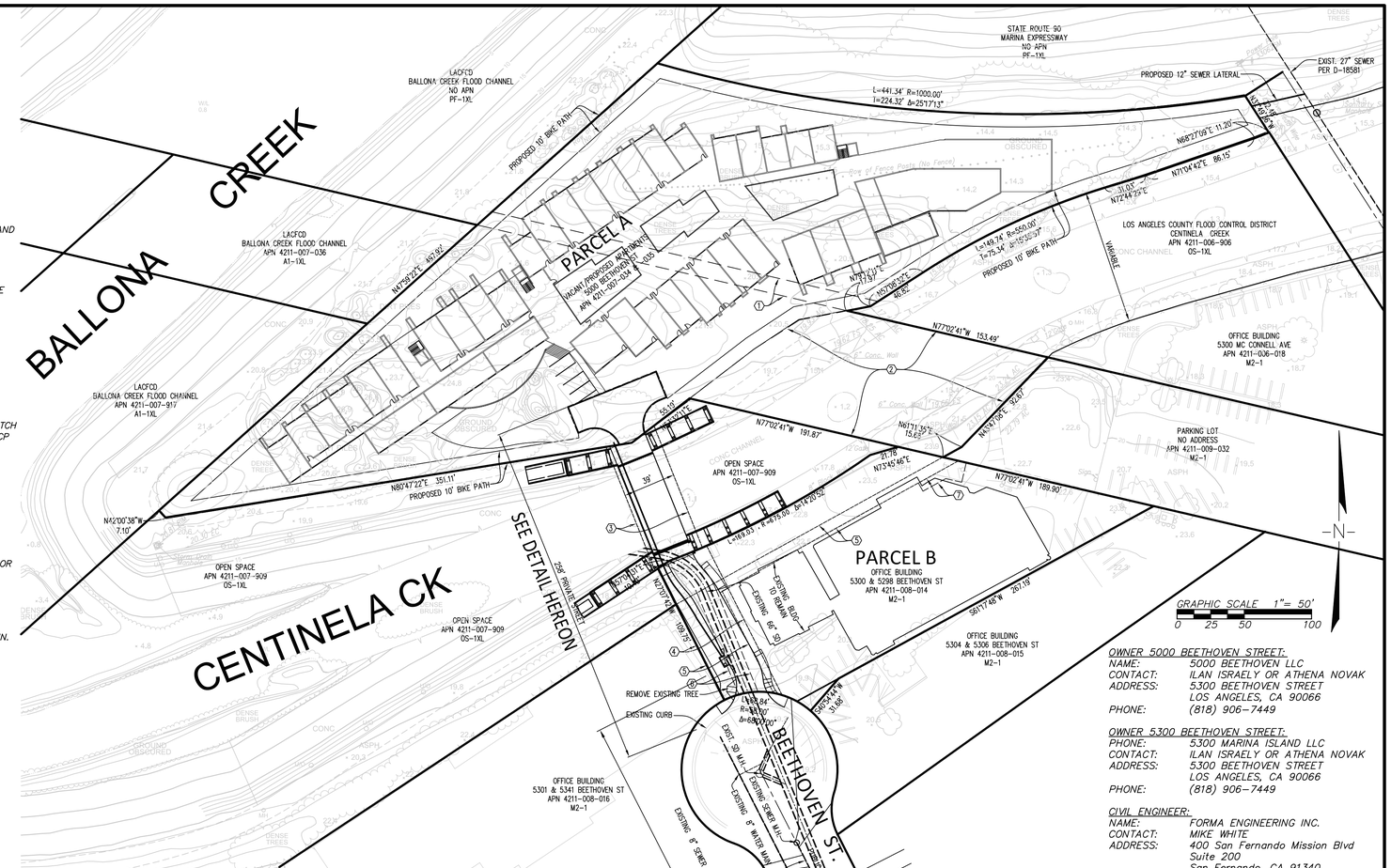
BASIS OF BEARINGS:

THE BASIS OF BEARINGS FOR THIS SURVEY IS THE CENTERLINE OF McCONNELL AVE AS SHOWN ON THE MAP OF TRACT NO. 26837, M.B. 771-25 AS N32°50'00"W

BENCHMARK:

CITY OF L.A. DATUM B.M. 05826
SURV PBM *STMPD 17-05826 1973* 2.8FT S OF S CURB LINE JEFFERSON BLVD; 27.3 FT E OF E CURB LINE PRODUCED; OF BEETHOVEN ST; IN NE CORNER OF CONCRETE FOOTING FOR TRAFFIC SIGNAL CONTROL BOX.

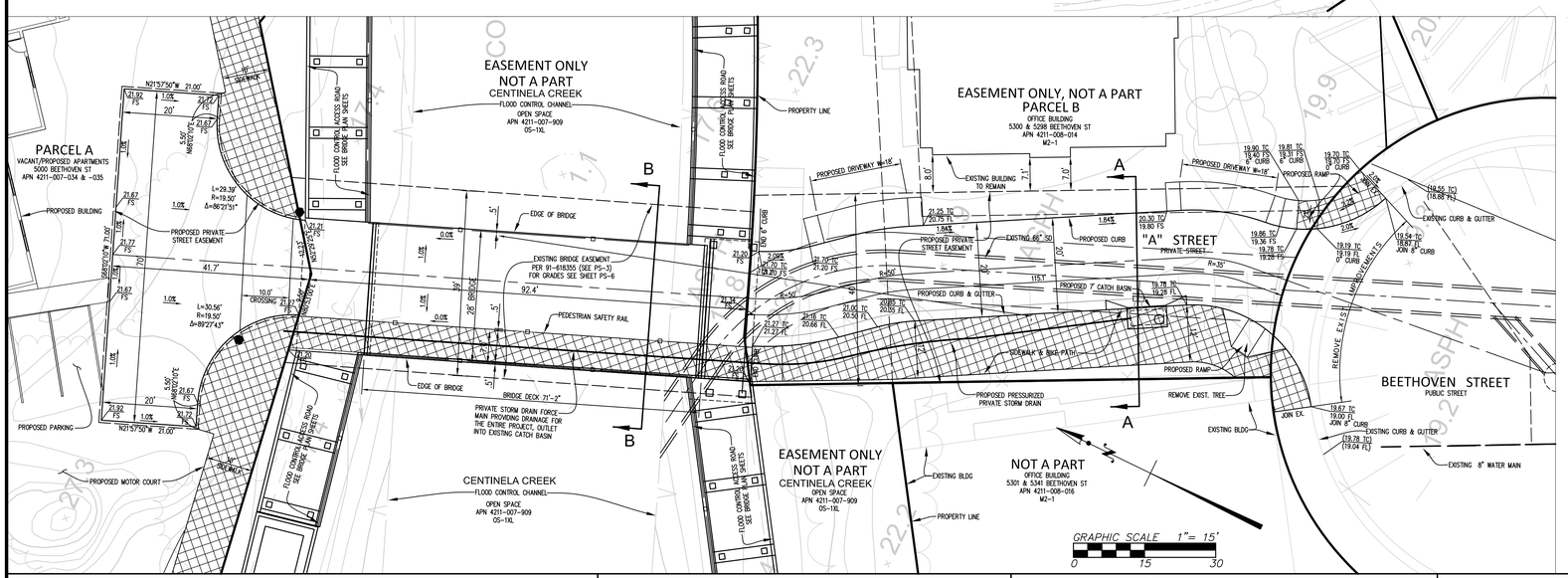
ELEVATION = 13.963 FEET ADJUSTED 1985

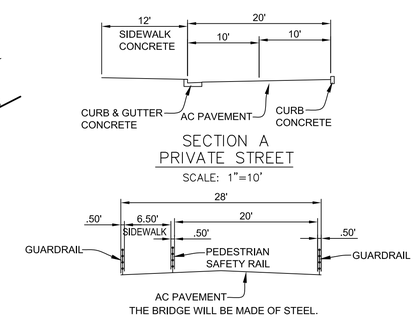


OWNER 5000 BEETHOVEN STREET:
NAME: 5000 BEETHOVEN LLC
CONTACT: ILAN ISRAELY OR ATHENA NOVAK
ADDRESS: 5300 BEETHOVEN STREET
LOS ANGELES, CA 90066
PHONE: (818) 906-7449

OWNER 5300 BEETHOVEN STREET:
PHONE: 5300 MARINA ISLAND LLC
CONTACT: ILAN ISRAELY OR ATHENA NOVAK
ADDRESS: 5300 BEETHOVEN STREET
LOS ANGELES, CA 90066
PHONE: (818) 906-7449

CIVIL ENGINEER:
NAME: FORMA ENGINEERING INC.
CONTACT: MIKE WHITE
ADDRESS: 400 San Fernando Mission Blvd
Suite 200
San Fernando, CA 91340
PHONE: (818) 698-8667





LEGEND:

- PRIVATE STREET EASEMENT
- CURB (HEIGHT PER SHEET PS-6)
- CURB & GUTTER (HEIGHT PER SHEET PS-6)
- CONCRETE SIDEWALK
- STOP SIGN AT PEDESTRIAN CROSSING

PRIVATE STREET AREAS:

PARCEL A - 2,077 SF
FLOOD CONTROL CHANNEL - 3,700 SF
PARCEL B - 4,592 SF

SHEET INDEX:

PS-1- SITE PLAN & NOTES
PS-2 - LEGAL DESCRIPTION AND EASEMENT OVER CHANNEL
PS-3 - LOS ANGELES COUNTY FLOOD CONTROL APPROVAL
PS-4 - ARMY CORP APPROVAL AND PIPE SUPPORT DETAIL
C-1 THROUGH C-7 - BRIDGE CIVIL ENGINEERING PLANS
S-1 THROUGH S-5 - BRIDGE STRUCTURAL PLANS

PREPARED FOR:

5000 BEETHOVEN LLC
5300 BEETHOVEN STREET
LOS ANGELES, CA 90066
(818) 906-7449
CONTACT: ATHENA NOVAK

PRIVATE STREET #1444

5000 BEETHOVEN STREET
LOS ANGELES, CA 90066

DEVELOPER'S ENGINEER:

FORMA ENGINEERING INC.
19814 Reseda Boulevard, Northridge, CA 91326
Phone: (818) 832-1710 · Fax: (818) 832-1740

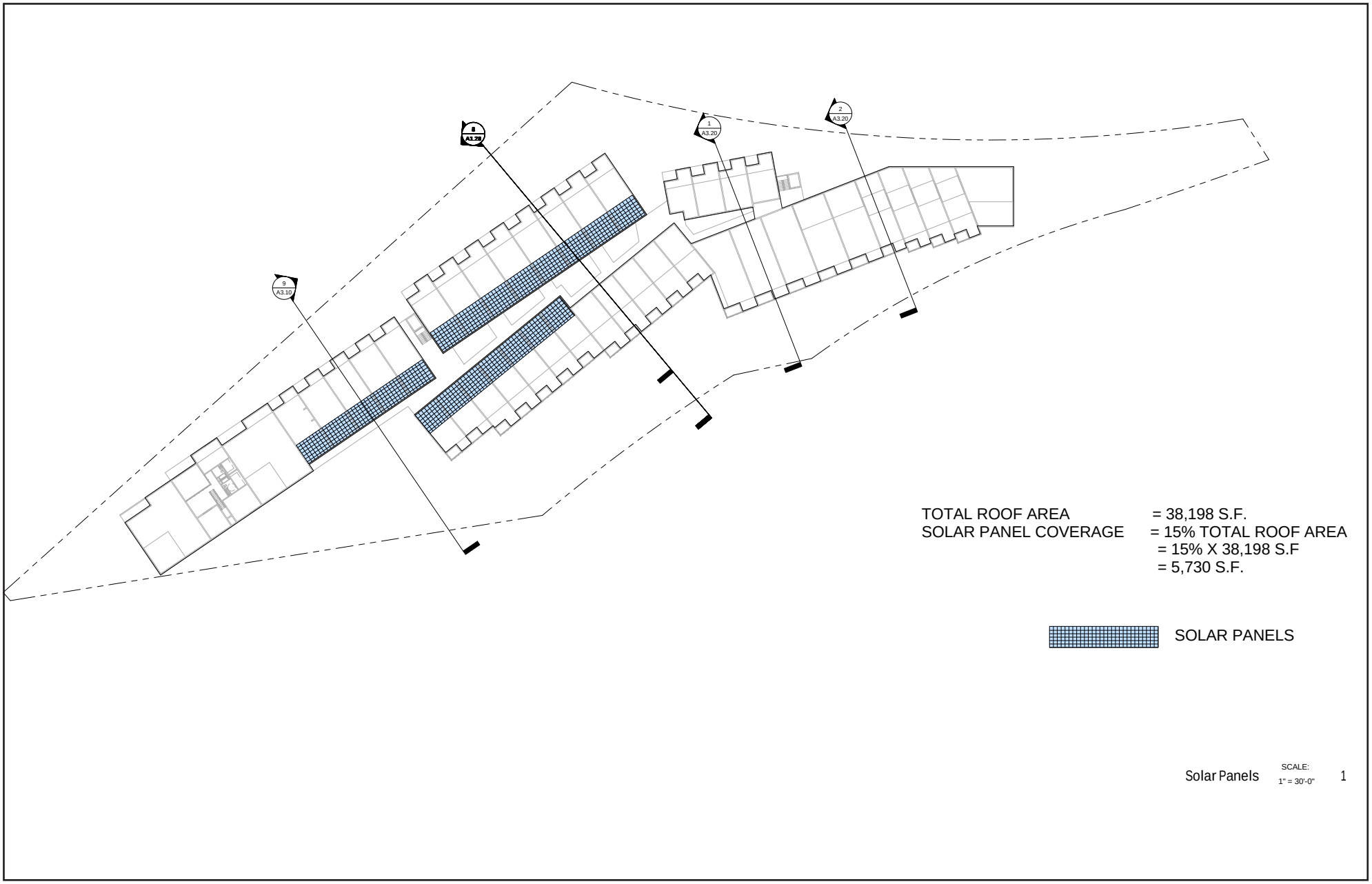
LAWRENCE WILSON L.S. 6712 2/01/2019 DATE

LICENSED LAND SURVEYOR
LAWRENCE WILSON
NO. 6712
EXP 6-30-20
STATE OF CALIFORNIA

No.	DATE	REVISION

DESIGNER: W.M.W.
CHECKED BY: W.M.W.
DATE: 2/01/2019
PS-1

FIGURE II-20 PRIVATE STREET PLANS



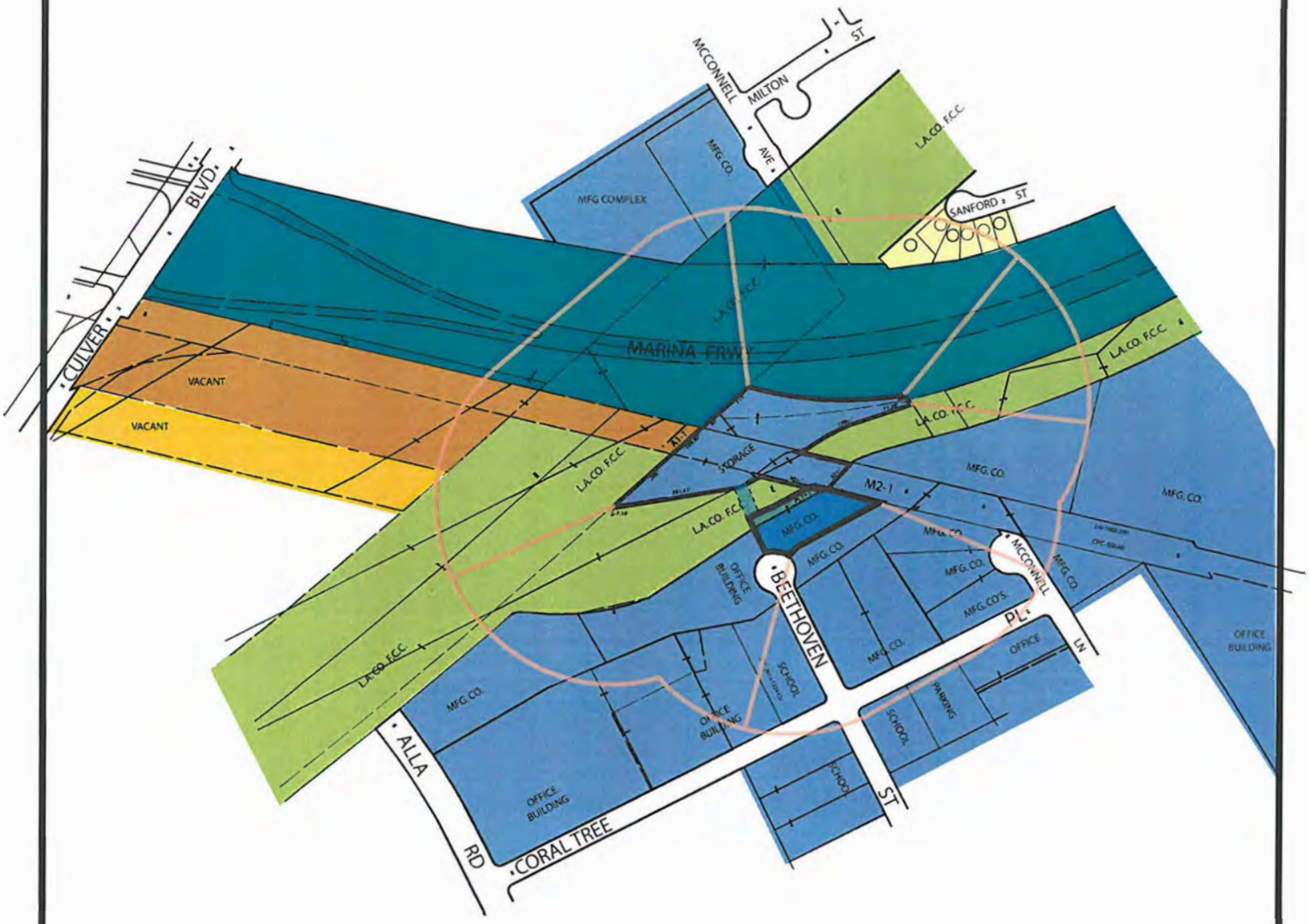
SOURCE: The Albert Group, 2018

FIGURE **II-21**

IMPACT SCIENCES

Solar Panel Roof Plan

1262.001•03/18



EXSITING PALMS-MAR VISTA-DEL REY COMMUNITY PLAN

LIGHT
MR2,M2

MEDIUM HIGH
R4,R4(PV)

MEDIUM
R3,R3(PV)

LOW
RE9,RS,R1,RU,
RD6,RD5

OPEN SPACE
OS,A1

PUBLIC FACILITIES
PF

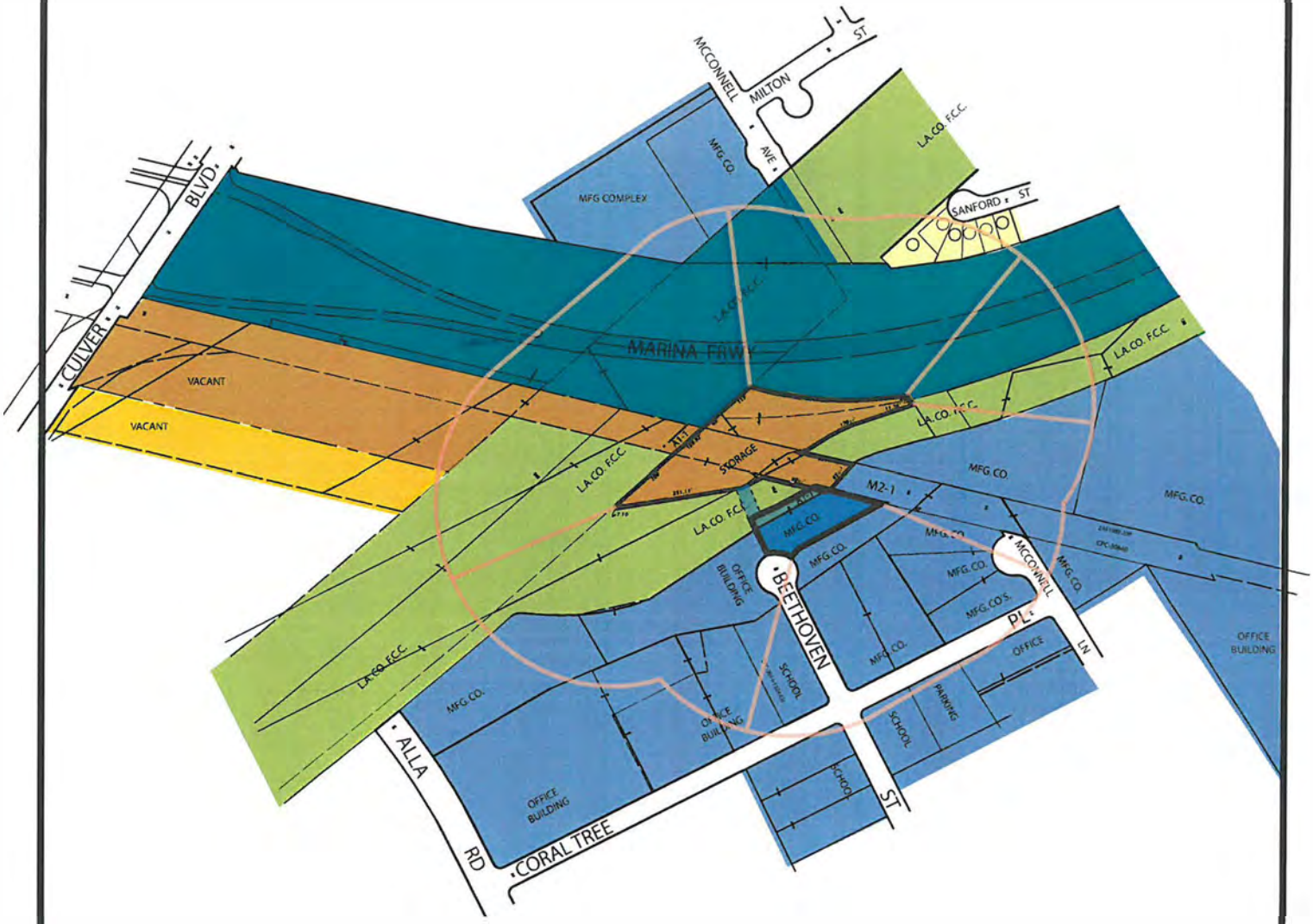
Quality Mapping Service

DATE: 02-06-19

QMS 19-072

NORTH

Figure II-22



PROPOSED PALMS-MAR VISTA-DEL REY COMMUNITY PLAN

LIGHT
MR2,M2

MEDIUM HIGH
R4,R4(PV)

MEDIUM
R3,R3(PV)

LOW
RE9,RS,R1,RU,
RD6,RD5

OPEN SPACE
OS,A1

PUBLIC FACILITIES
PF

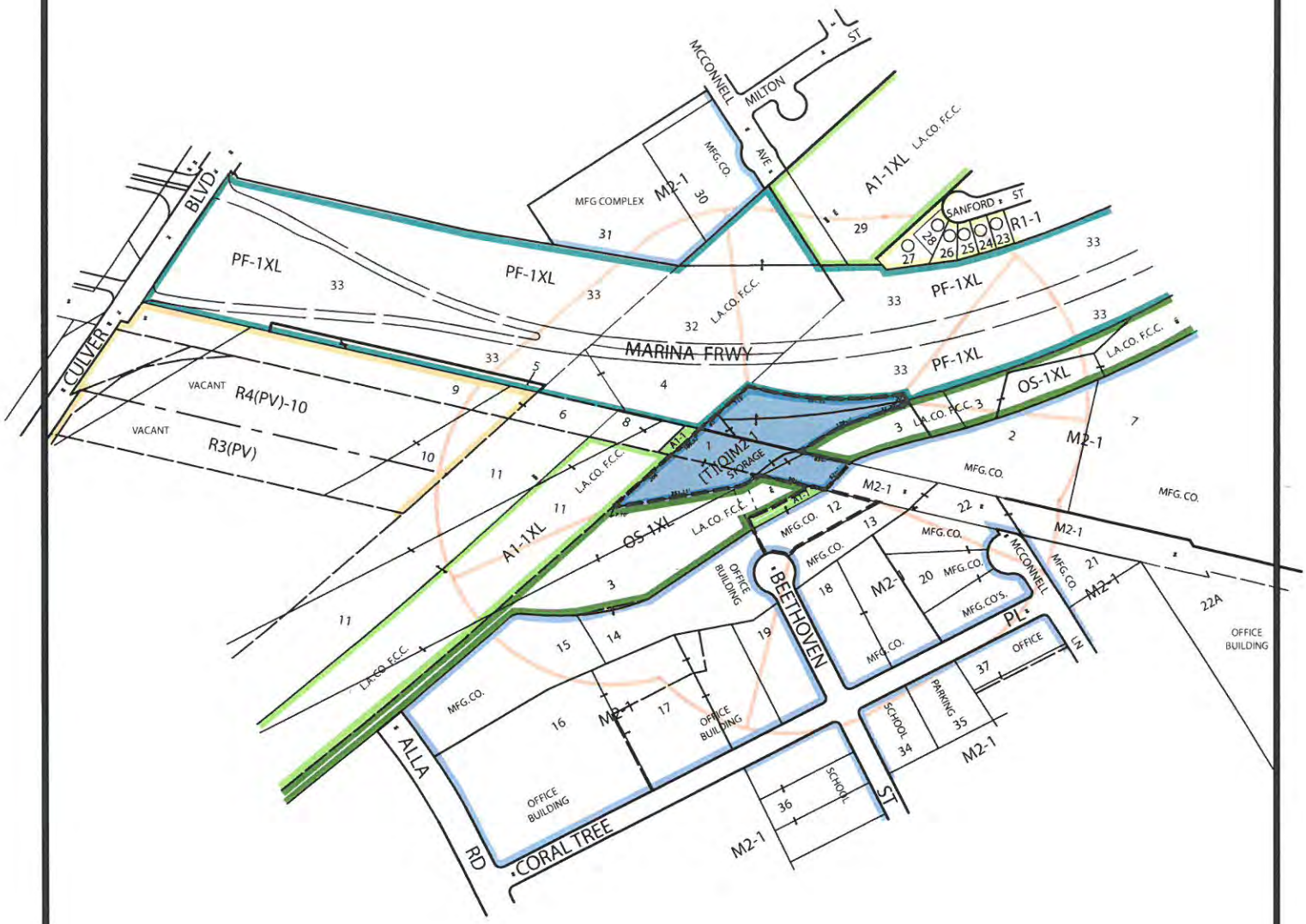
Quality Mapping Service

DATE: 02-06-19

QMS 19-072

NORTH

Figure II-23



EXISTING ZONING

REQUESTED: [T][Q] M2-1 [redacted] TO (T)(Q) R4-1

AREA OF ZONE CHANGE

SUBJECT PROPERTY

Quality Mapping Service
14549 Archwood St, Suite 301
Van Nuys, Ca 91405
PHONE: (818) 997-7949

DATE: 02-06-19

QMS 19-072

NORTH

Figure II-24

PROJECT OBJECTIVES

The Project Applicant's objectives for the proposed Project are as follows:

- Develop a multi-family residential project that constructs 236 new residential units, 38 units of which would be affordable units, in compliance with Ballot Measure JJJ, which would contribute to the City's housing stock consistent with the Mayor's Executive Directive No. 13 and the 2014-2021 Regional Housing Needs Assessment (RHNA).
- Develop a multi-family residential project that supports the development of a multi-modal transportation system and promotes regional mobility goals to reduce vehicle trips and infrastructure costs, by committing to an aggressive Transportation Demand Management (TDM) Program that would include:
    - Good site access for vehicles, pedestrians and bicyclists
    - A privately funded dedicated shuttle that would provide drop off and pick up service to nearby transit stations, entertainment and work centers. The shuttle would operate daily, at frequency that meets the travel needs of site residents.
    - An on-site Transit Plaza feature, to facilitate access to public transportation for both visitors and residents featuring a centralized rideshare (i.e. Uber and Lyft) pick up and drop off location, and zip cars;
    - Electric vehicle (EV) charging stations for use by visitors and residents (approximately 30 percent of the parking spaces will be equipped with EV Charging;
    - Carpool and ride-share notices and postings;
    - A satellite remote work center for residents who wish to telecommute to work; and
    - Ample short and long term bicycle parking (240 long term and 38 short term bicycle parking spaces).
- Provide a building campus in a contemporary architectural style that would be attractive and upscale in overall appearance, helping to revitalize the visual character of the area.
- Provide amenities for residents, including a fitness club, a community room, and a business/conference center.
- Include natural habitat areas throughout the property that provide wildlife refuges and conservation education opportunities.
- Provide landscaping throughout the property to enhance the appearance of the site.

- Provide attractive wayfinding and security lighting; installed with shields and directed away from neighboring residential uses to prevent potential light spillover.
- Provide a parking garage to accommodate the visitor and residential uses and to prevent potential impacts to on-street parking.
- To mitigate, to the extent feasible, the potential environmental impacts of the proposed project.

DISCRETIONARY ACTIONS

The proposed Project would require the following discretionary actions from the City of Los Angeles Department of City Planning and other governmental agencies:

- Approval of a General Plan Amendment from Light Industrial to High Medium Residential;
- Approval of a Vesting Zone Change from [T][Q]M2-1 (Light Industrial) to [T][Q]R-4-1 (High Medium Residential) per LAMC Section 12.32. Q.3.A;
- Approval of Site Plan Review (SPR) findings per LAMC Section 16.05 for a development project which creates or results in an increase of 50 or more dwelling units;
- Approval of a Private Street;
- Approval of a Development Agreement;
- Adoption of the Expanded Initial Study/Mitigated Negative Declaration (IS/MND); and
- Approval of other permits, ministerial or discretionary, may be necessary in order to execute and implement the Project. Such approvals may include, but are not limited to: landscaping approvals, exterior approvals, storm water discharge permits, grading permits, haul route permits, and installation and hookup approvals for public utilities and related permits.

CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 615, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY
AND CHECKLIST

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE
City of Los Angeles, Department of City Planning	*CD 11 – Mike Bonin*	*9/5/2019*

RESPONSIBLE AGENCIES

PROJECT TITLE/NO.	CASE NO.
Del Rey Pointe Residential Project *5000 Beethoven Street* *Los Angeles, California 90066*	CPC-2016-4266-GPAJ-VZCJ-SPR CPC-2016-4268-DA ENV-2016-4267-MND PS-1444

PREVIOUS ACTIONS CASE NO.	
	❑ **DOES have significant changes from previous actions.** ❑ **DOES NOT have significant changes from previous actions.**

PROJECT DESCRIPTION:

See Section II, Project Description.

ENVIRONMENTAL SETTING:

The Project Site is located on a peninsula in the Palms-Mar Vista-Del Rey Community Plan Area of the City of Los Angeles. The approximately 121,493 square foot triangular-shaped site is located on a peninsula bounded by the confluence of Ballona Creek to the north, Centinela Creek to the south and vacant land to the east. The site is currently zoned [T][Q]M2-1 (Light Industrial) and undeveloped, vacant land. The State Route 90 Marina Freeway (SR 90 Freeway) is adjacent to the site to the northeast and zoned PF-1XL (Public Facility – Freeway). Vacant land to the east is zoned R3(PV) and R4(PV)-10 (Medium and High Medium Residential). Properties north of the SR 90 Freeway and Ballona Creek are zoned M2-1 (Light Manufacturing) and improved with manufacturing uses. Properties to the northeast of the SR 90 Freeway are zoned R1-1 (Low Residential) and improved with single-family residences. Properties across Centinela Creek to the south are zoned M2-1 (Light Industrial), and improved with commercial buildings, manufacturing, and associated parking. See Section II, Project Description

PROJECT LOCATION

The project site is located at 5000 Beethoven Street in the Palms-Mar Vista-Del Rey Community Plan Area of the City of Los Angeles. The approximately 130,162 square foot (sf) triangular-shaped site is located on a peninsula bounded by the confluence of Ballona Creek to the north, Centinela Creek to the south and vacant land to the east. The State Route 90 Marina Freeway (SR 90 Freeway) is adjacent to the site to the northeast. See Section II, Project Description

PLANNING DISTRICT	STATUS:
Palms-Mar Vista-Del Rey Community Plan	❑ **PRELIMINARY** ❑ **PROPOSED** ☑ **ADOPTED September 16, 1997 (Plan Update)**

EXISTING ZONING	MAX. DENSITY ZONING	❑ **DOES NOT CONFORM TO PLAN**
[T][Q]M2-1(Light Industrial)	*1 du / 400 sf lot area = 303 du under proposed zoning*	
PLANNED LAND USE & ZONE	**MAX. DENSITY PLAN**	❑ **DOES NOT CONFORM TO PLAN**
[T][Q]R4-1 (High Medium Residential)	*1 du / 400 sf lot area = 303 du under proposed land use*	
SURROUNDING LAND USES	**PROJECT DENSITY**	❑ **NO DISTRICT PLAN**
industrial/manufacturing, institutional, commercial, single-family residential,	*236 dwelling units*	

☞ **DETERMINATION (To be completed by Lead Agency)**

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 on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, 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 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 EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Yousal Abdullah — Principal City Planner.

SIGNATURE **TITLE**

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 where 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 off-site as well as on-site, 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, then the checklist answers must indicate whether the impact is potentially significant, less that 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 EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "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 (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5) Earlier analysis must be used where, pursuant to the 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:

   1) Earlier Analysis Used. Identify and state where they are available for review.

   2) 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.

   3) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which 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, where appropriate, include a reference to the page or pages where the statement is substantiated

7) Supporting Information Sources: A sources 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 whichever format is selected.

9) The explanation of each issue should identify:

   1) The significance criteria or threshold, if any, used to evaluate each question; and

   2) The mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

☞ BACKGROUND

PROPONENT NAME. *5000 Beethoven, LLC*	**PHONE NUMBER** *(818) 906-7449*
PROPONENT ADDRESS *5300 Beethoven Street, Los Angeles, CA 90066*	
AGENCY REQUIRING CHECKLIST *City of Los Angeles, Department of City Planning*	**DATE SUBMITTED** *November 8, 2016*
PROPOSAL NAME (If Applicable) *Del Rey Pointe Residential Project*	

☞ **ENVIRONMENTAL IMPACTS** (Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

		Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	**AESTHETICS.** Would the project:				
a.	Have a substantial adverse effect on a scenic vista?	❑	❑	❑	☒
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?	❑	❑	❑	☒
c.	Substantially degrade the existing visual character or quality of the site and its surroundings?	❑	❑	☒	❑
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	❑	❑	☒	❑
2.	**AGRICULTURAL RESOURCES.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	❑	❑	❑	☒
b.	Conflict the existing zoning for agricultural use, or a Williamson Act Contract?	❑	❑	❑	☒
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))?	❑	❑	❑	☒
d.	Result in the loss of forest land or conversion of forest land to non-forest use?	❑	❑	❑	☒
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?	❑	❑	❑	☒
3.	**AIR QUALITY.** The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project:				

		Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Conflict with or obstruct implementation of the applicable air quality plan?	❑	❑	☒	❑
b.	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	❑	❑	☒	❑
c.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative threshold for ozone precursors)?	❑	❑	☒	❑
d.	Expose sensitive receptors to substantial pollutant concentrations?	❑	❑	☒	❑
e.	Create objectionable odors affecting a substantial number of people?	❑	❑	❑	☒
4.	**BIOLOGICAL RESOURCES.** Would the project:				
a.	Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	❑	❑	❑	☒
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	❑	❑	❑	☒
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?	❑	❑	❑	☒
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?	❑	❑	☒	❑
e.	Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	❑	❑	☒	❑
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?	❑	❑	❑	☒

5. CULTURAL RESOURCES: Would the project:

		Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Cause a substantial adverse change in significance of a historical resource as defined in State CEQA Section 15064.5?	❑	❑	❑	☒
b.	Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section 15064.5?	❑	❑	☒	❑
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	❑	❑	☒	❑
d.	Disturb any human remains, including those interred outside of formal cemeteries?	❑	❑	☒	❑
6.	**GEOLOGY AND SOILS.** Would the project:				
a.	Exposure of 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.	❑	❑	☒	❑
ii.	Strong seismic ground shaking?	❑	❑	☒	❑
iii.	Seismic-related ground failure, including liquefaction?	❑	❑	☒	❑
iv.	Landslides?	❑	❑	❑	☒
b.	Result in substantial soil erosion or the loss of topsoil?	❑	❑	☒	❑
c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	❑	❑	☒	❑
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?	❑	❑	☒	❑
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	❑	❑	❑	☒
7.	**GREENHOUSE GAS EMISSIONS.** Would the project:				
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	❑	❑	☒	❑
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of	❑	❑	☒	❑

		Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
	greenhouse gases?				
8.	**HAZARDS AND HAZARDOUS MATERIALS.** Would the project:				
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials	☐	☐	☒	☐
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?	☐	☐	☒	☐
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	☐	☐	☐	☒
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
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?	☐	☐	☐	☒
9.	**HYDROLOGY AND WATER QUALITY.** Would the proposal result in:				
a.	Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b.	Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for	☐	☐	☒	☐

		Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
	which permits have been granted)?				
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 which would result in substantial erosion or siltation on- or off-site?	❑	❑	☒	❑
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 an manner which would result in flooding on- or off site?	❑	❑	☒	❑
e.	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	❑	❑	☒	❑
f.	Otherwise substantially degrade water quality?	❑	❑	☒	❑
g.	Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	❑	❑	☒	❑
h.	Place within a 100-year flood plain structures which would impede or redirect flood flows?	❑	❑	☒	❑
i.	Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam?	❑	❑	☒	❑
j.	Inundation by seiche, tsunami, or mudflow?	❑	❑	☒	❑
10.	**LAND USE AND PLANNING**. Would the project:				
a.	Physically divide an established community?	❑	❑	☒	❑
b.	Conflict with 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, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	❑	❑	☒	❑
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?	❑	❑	❑	☒
11.	**MINERAL RESOURCES**. Would the project:				
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	❑	❑	❑	☒
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?	❑	❑	❑	☒

		Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
12.	**NOISE.** Would the project:				
a.	Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	❑	❑	☒	❑
b.	Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	❑	❑	☒	❑
c.	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	❑	❑	☒	❑
d.	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	❑	❑	☒	❑
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?	❑	❑	❑	☒
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?	❑	❑	❑	☒
13.	**POPULATION AND HOUSING**. 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)?	❑	❑	☒	❑
b.	Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	❑	❑	❑	☒
c.	Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	❑	❑	❑	☒
14.	**PUBLIC SERVICES.** Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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:				
a.	Fire protection?	❑	❑	☒	❑
b.	Police protection?	❑	❑	☒	❑

		Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.	Schools?	❑	❑	☒	❑
d.	Parks?	❑	❑	☒	❑
e.	Other governmental services (libraries)?	❑	❑	☒	❑
15.	**RECREATION.**				
a.	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	❑	❑	☒	❑
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	❑	❑	☒	❑
16.	**TRANSPORTATION/CIRCULATION**. 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?	❑	☒	❑	❑
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?	❑	❑	☒	❑
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?	❑	❑	❑	☒
d.	Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	❑	☒	❑	❑
e.	Result in inadequate emergency access?	❑	☒	❑	❑
f.	Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	❑	❑	☒	❑

		Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
17.	**TRIBAL CULTURAL RESOURCES.** Would the project:				
a.	Cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined in Section 21074?	❑	❑	☒	❑
18.	**UTILITIES.** Would the project:				
a.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	❑	❑	☒	❑
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?	❑	❑	☒	❑
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?	❑	❑	☒	❑
d.	Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	❑	❑	☒	❑
e.	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	❑	❑	☒	❑
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	❑	❑	☒	❑
g.	Comply with federal, state, and local statutes and regulations related to solid waste?	❑	❑	☒	❑
19.	**MANDATORY FINDINGS OF SIGNIFICANCE.**				
a.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	❑	❑	☒	❑
b.	Does the project have impacts which are individually limited, but cumulatively considerable?("Cumulatively considerable" means that the incremental effects of an individual 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).	❑	❑	❑	☒
c.	Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	❑	❑	☒	❑

		Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
20.	**ENERGY.** Would the project:				
a.	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	❑	❑	☒	❑
b.	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	❑	❑	☒	❑
21.	**WILDFIRE.** Would the project:				
a.	Substantially impair an adopted emergency response plan or emergency evacuation plan?	❑	❑	☒	❑
b.	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	❑	❑	☒	❑
c.	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	❑	❑	☒	❑
d.	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	❑	❑	☒	❑

☞ **DISCUSSION OF THE ENVIRONMENTAL EVALUATION** **(Attach additional sheets if necessary)**

☞ **See Expanded Environmental Analysis and Explanation of Checklist Determinations (attached)**

PREPARED BY	TITLE	TELEPHONE #	DATE
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IV. ENVIRONMENTAL IMPACT ANALYSIS

INTRODUCTION

This section of the Initial Study contains an assessment and discussion of impacts associated with each environmental issue and subject area identified in the Initial Study Checklist. The thresholds of significance are based on Appendix G of the State CEQA Guidelines.

IMPACT ANALYSIS

1. AESTHETICS

According to Appendix G of the State CEQA Guidelines, the impacts of a Proposed Project related to aesthetics would be considered significant if the project would:

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

Less Than Significant Impact. A significant impact would occur if the proposed project would have a substantial adverse effect on a scenic vista. A scenic vista refers to views of focal points or panoramic views of broader geographic areas that have visual interest. A focal point view would consist of a view of a notable object, building, or setting. An impact on a scenic vista would occur if the bulk or design of a building or development contrasts enough with a visually interesting view, so that the quality of the view is permanently affected. The Proposed Project Site is in the developed Palms - Mar Vista - Del Rey Community Plan Area of the City of Los Angeles. The Proposed Project would be a six-story residential development, built on a peninsula at the confluence of Ballona Creek and Centinela Creek. The nearest scenic views or vistas from the Project Site would be of the Westchester Bluffs, approximately 0.5 miles south of the Project Site, and the Pacific Ocean, approximately 2.5 miles west of the Project Site.

The term "views" generally refers to visual access to, or the visibility of, a particular sight from a given vantage point or corridor. "Focal views" focus on a particular object, scene, setting, or feature of visual interest; "panoramic views" or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Examples of focal views include natural landforms, public art/signs, individual buildings, and specific, important trees. Panoramic views are usually associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, the ocean, or other water bodies.

The State of California and the City of Los Angeles have recognized the value of access to visual resources through planning and zoning regulations which designate, preserve, and enhance public views. Through the General Plan, Community Plans, and the designation of scenic resources, the City specifies development standards which help prevent the obstruction of views. These standards include the regulation of building height, mass, and floor to area ratio, as well as landscaping and grading, which are the principal issues in view obstruction. Individual specific or master plans may include additional standards such as view-sensitive site planning, structure design and grading requirements, transfer of development rights to avoid development in sensitive viewsheds, and preservation of mountain ridges and other visual resources to minimize obstruction of views.

The Proposed Project would be isolated from other developments, as shown in **Figure II-2, Aerial View of the Project Site**, due to its location on a peninsula bounded by the confluence of Ballona Creek to the north, the SR 90 Freeway to the northeast, vacant land to the east, and Centinela Creek to the south. Views of and to the Project Site are limited to the immediate area due to the flat topography and the density of existing development and landscaping in the vicinity. The availability of broad views to scenic resources (i.e. the Bluffs and the Pacific Ocean) are very limited due to one- and multiple-story commercial developments and the distance. The Santa Monica Mountains, located approximately 7.3 miles to the north of the Project Site, are not readily visible from the Project Site due to topography and intervening structures, including the State Route 90 Marina Freeway (SR 90 Freeway).

The SR 90 Freeway is directly adjacent to the northwestern edge of the Project Site; immediately after this point, the SR 90 Freeway crosses over Ballona Creek, providing a view corridor along the Ballona Creek Bike Path toward the Pacific Ocean. As the views toward the Pacific Ocean are down the Creek, they would not be blocked by the implementation of the Proposed Project. Thus, impacts related to scenic vistas would be less than significant and no further analysis is required.

Therefore, although the proposed project would increase the height and massing of development on the project site, project implementation would not obstruct any views of unique scenic vistas or focal points. Therefore, impacts related to scenic vistas would be less than significant. Development of the proposed project would result in an incremental intensification of existing prevailing land uses in an urbanized area of Los Angeles. Furthermore, development of the project and related projects is expected to occur in accordance with adopted plans and regulations. Therefore, cumulative aesthetic impacts would be less than significant.

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

No impact. A significant impact would occur if the proposed project would substantially damage scenic resources within a State Scenic Highway. The City of Los Angeles' General Plan Mobility Element (Citywide General Plan Circulation System Maps) as well as the CalTrans website at http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/langeles.htm indicates that no State-designated scenic highways are located near the project site. The Project Site is currently vacant, undeveloped land; as such there are no scenic resources present on the site (refer to **Figure IV-1, Existing Site Conditions**). Further, the Project Site is not located along or near a state scenic highway. The nearest eligible state scenic highway is a segment of the State Route 1 Pacific Coast Highway (SR 1 Highway) from the Los Angeles County/Ventura County border south to SR 187 (Venice Boulevard) near Santa Monica.[1] Although the SR 1 Highway is approximately 3,300 feet south of the Project Site, this portion of the SR 1 Highway is not officially designated as an eligible highway. Views of the eligible portion of SR 1 Highway are blocked due to terrain and various developments, and are not available to motorists proximate to the Project Site. Therefore, no impacts to scenic resources within a state scenic highway would occur and no further analysis is required.

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

Less Than Significant Impact. A significant impact may occur if a project would introduce incompatible visual elements on the Proposed Project site or visual elements that would be incompatible with the character of the area surrounding the Proposed Project site, or substantially degrade the existing visual character or quality of the project site and its surroundings. Significant impacts to the visual character of a site and its surroundings are generally based on the removal of features with aesthetic value, the introduction of contrasting urban features into a local area, and the degree to which the elements of the proposed project detract from the visual character of an area.

The Proposed Project would be isolated from other developments due to its location on a peninsula bounded by the confluence of Ballona Creek to the north, the SR 90 Freeway to the northeast, vacant land to the east, and Centinela Creek to the south. The area surrounding the peninsula and Project Site is urbanized, and characterized by a mix of light industrial,

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[1] *City of Los Angeles General Plan Mobility Element (Circulation System Maps) and State of California Department of Transportation, California Scenic Highway Mapping System, http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/langeles.htm, accessed January 17, 2017.*

manufacturing, institutional, commercial, and residential uses. The nearest adjacent structures are office and manufacturing uses approximately 100 feet to the south (up to 4 stories in height) and 400 feet to the north (1 story in height), and single-family residences approximately 400 feet to the northeast (up to 2 stories in height).

Currently the Project Site is vacant with the exception of a few shipping containers, and is sparsely vegetated with largely ruderal, non-native flora (refer to **Figure IV-1, Existing Site Conditions**).

The Proposed Project is a multi-family residential project that would be six (6) stories and up to 56 feet in height, with a total gross building area of 235,000 square feet for a Floor Area Ratio (FAR) of 1.93:1. The Project requests a General Plan Amendment and Vesting Zone Change from [T][Q]M2-1 (Light Industrial) to [T][Q]R4-1 (High Medium Residential). The 6-story building will not be compatible in scale, massing, or style with the existing structures immediately adjacent; however it would be consistent with the general urban character of the Playa Vista community approximately 0.25 miles to the south of the site.

The Proposed Project is designed around a central courtyard with 6-story residential buildings surrounding it. The residential buildings are articulated with a combination of stepbacks, recesses, and building materials, and are connected with upper-level open-air walkways, to provide breaks in the building plane. Landscaping and new trees would be provided throughout the entire Project Site, and two natural habitat preserves would be provided on the eastern and western ends of the Project Site. The proposed project would include design features and landscaping improvements to enhance the visual quality of the area. Therefore, the Proposed Project would not degrade the visual quality of the area and would be consistent with surrounding uses. Impacts would be less than significant and no further analysis is required.

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

Less than Significant Impact. A significant impact would occur if light and glare substantially altered the character of off-site areas surrounding the site or interfered with the performance of an off-site activity. Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-

like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions.

Due to the urbanized nature of the area, a moderate level of ambient nighttime light already exists within the vicinity. As stated prior, the SR 90 Freeway is adjacent to the Project Site on the northeast border, and would exhibit high nighttime lighting compared to any lighting the Proposed Project may emit. Nighttime lighting sources include street lights, vehicle headlights from the Marina Freeway, and interior and exterior building illumination of surrounding properties. While there are no structures currently located on the site and current on-site nighttime illumination levels are not high, the Project Site is located in an urban environment characterized by high levels of ambient nighttime illumination. The nearest light-sensitive uses are the single-family residences approximately 400 feet to the northeast and east of the SR 90 Freeway, and therefore would not be impacted by the lighting of the Proposed Project.

The Proposed Project would replace the vacant lot with a new residential 6-story building, which would increase the nighttime illumination on the Project Site from current levels. Lighting associated with the proposed residential uses would include interior lights, architectural and/or thematic accent lighting to highlight building elements or details, soft accent lighting for landscaping where appropriate, exterior security lighting, and wall- or pole-mounted light fixtures. All lighting of outdoor areas will be directed onto driveways, walkways, and parking areas and away from adjacent properties and public rights of way to avoid any light impacts from lighting fixtures included in the project. During the nighttime, the Proposed Project would only emit low-level for security purposes and wayfinding for residents. For these reasons, the new lighting established on the site will not result in a substantial increase in light that could adversely affect nighttime views in the area.

Glare from building windows would increase under the Proposed Project. Glare from the Proposed Project may affect motorists traveling on the SR 90 Freeway during daytime hours. However, as discussed in Section II, Project Description, non-reflective materials would be used in the construction of the Proposed Project to minimize any sources of glare, and thus the project would not result in a substantial new source of glare that would adversely affect daytime views in the area. Finally, the project will be required to incorporate lighting design specifications to meet City standards as outlined in the Section 93.0117 of the City of Los Angeles Municipal Code (LAMC), to ensure that the project will have a less than significant impact on light and glare. Therefore, the project's impacts regarding light and glare would be less than significant. No further analysis is required.

Figure IV-I Existing Site Conditions

2. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest Range and Assessment Project and Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. 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?

No Impact. A significant impact would occur if the proposed project would convert valued farmland to non-agricultural uses. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland." The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site is not included in the Important Farmland category.[2] The Project Site is located within a developed area of the City of Los Angeles and on a site that is currently vacant. Due to its urban setting, the project site and surrounding area are not included in the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, implementation of the Proposed Project would not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. No impacts would occur.

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

No Impact. A significant impact would occur if the proposed project conflicted with existing agricultural zoning or agricultural parcels enrolled under the Williamson Act. The Proposed Project is located in the Palms–Mar Vista–Del Rey Community Plan Area and zoned [T][Q]M2-1. The General Plan land use designation for the Project Site is Light Industrial. The Project Site is not zoned for agricultural uses nor do agricultural uses occur on the Project Site. Only land located within an agricultural preserve is eligible for enrollment under a Williamson Act contract. Accordingly, the Project Site does not contain any lands covered by a Williamson Act contract.

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[2] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County 2010 Important Farmland Map, ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/los12.pdf, accessed December 05, 2016.*

Therefore, implementation of the Proposed Project would not conflict with existing agricultural zoning or a Williamson Act Contract. No impacts would occur.

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))?

No Impact. A significant impact would occur if the proposed project conflicted with existing zoning or caused rezoning of forest land or timberland, or resulted in the loss of forest land or in the conversion of forest land to non-forest use. The project site and the surrounding area are not zoned for forest land or timberland. As discussed above the Project Site is zoned [T][Q]M2-1 and is located in an urban area. The Project Site and the surrounding area are primarily zoned as industrial or open space. The site and the surrounding area do not contain any forest land or land zoned for timberland production. Implementation of the Proposed Project would not conflict with existing zoning for, or cause rezoning of forest land or timberland. No impacts would occur, and no further analysis is required.

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

No Impact. See response to **Section 2(c)**, above.

A significant impact would occur if the proposed project resulted in the loss of forest land or in the conversion of forest land to non-forest use. As discussed above, the project site and the surrounding area are not zoned for forest land or timberland. Additionally, forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."[3] Timberland is defined as "land…which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees."[4] There are 41 non-native trees located on the Project Site, however none of these trees are of a commercial species as defined above.[5] Additional there are trees are located along the streets adjacent to the Project Site, but are largely ornamental. There is no forest land or timberland on-site or in the project vicinity and project development would not cause a loss of forest land or timberland. No impacts would occur.

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3 *California Public Resources Code Section 12220[g]*

4 *California Public Resources Code Section 4526*

5 *Arborist Report for 5000 Beethoven Street, prepared by William R. McKinley, Consulting Arborist, dated May 12, 2016, included as Appendix B-3 of this Initial Study.*

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?

No Impact. A significant impact would occur if the proposed project caused the conversion of farmland to non-agricultural use. See responses to **Sections 2(a)** through **2(d)**, above. The site is located in a developed area and there are no agricultural uses or related uses on the site. The site does not result in the conversion of farmland, to other uses. No impacts would occur.

3. AIR QUALITY

This section is based on the information provided in the California Emissions Estimator Model (CalEEMod) 2016.3.1 model using assumptions from the Project Applicant for project construction and operational emissions. The CalEEMod output report is incorporated herein by this reference, and provided in **Appendix A** to this Draft Initial Study.

Environmental Setting

Pollutants and Effects

Criteria air pollutants are defined as pollutants for which the federal and State governments have established ambient air quality standards for outdoor concentrations. The federal and State standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter 2.5 microns or less in diameter (PM2.5), particulate matter ten microns or less in diameter (PM10), and lead (Pb). These pollutants are discussed below.

- Carbon Monoxide (CO) is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. It is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, automobile exhaust accounts for the majority of emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient concentrations generally follow the spatial and temporal distributions of vehicular traffic. Concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February. Inversions are an atmospheric condition in which a layer of warm air traps cooler air near the surface of the earth, preventing the normal rising of surface air. The highest concentrations occur during the colder months of the year when inversion conditions are more frequent. CO is a health concern because it competes with oxygen, often replacing it in the blood and reducing the blood's ability to transport oxygen to vital organs. Excess CO exposure can lead to dizziness, fatigue, and impair central nervous system functions.

- Ozone (O_3) is a colorless gas that is formed in the atmosphere when reactive organic gases (ROG) and nitrogen oxides (NO_X) react in the presence of ultraviolet sunlight. O_3 is not a primary pollutant; rather, it is a secondary pollutant formed by complex interactions of

two pollutants directly emitted into the atmosphere. The primary sources of ROG and NO_X, the components of O_3, are automobile exhaust and industrial sources. Meteorology and terrain play major roles in O_3 formation. Ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The greatest source of smog-producing gases is the automobile. Short-term exposure (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.

- Nitrogen Dioxide (NO_2) like O_3, is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO_2 are collectively referred to as NO_X and are major contributors to O_3 formation. NO_2 also contributes to the formation of PM10. High concentrations of NO_2 can cause breathing difficulties and result in a brownish-red cast to the atmosphere with reduced visibility. There is some indication of a relationship between NO_2 and chronic pulmonary fibrosis. Some increase of bronchitis in children (2-3 years old) has been observed at concentrations below 0.3 parts per million (ppm).

- Sulfur Dioxide (SO_2) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Main sources of SO_2 are coal and oil used in power plants and industries. Generally, the highest levels of SO_2 are found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. SO_2 is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO_2 can also yellow plant leaves and erode iron and steel.

- Particulate Matter (PM) consists of small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals and can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Fine particulate matter, or PM2.5, is roughly 1/28 the diameter of a human hair and results from fuel combustion (e.g. motor vehicles, power generation, industrial facilities), residential fireplaces, and wood stoves. In addition, PM2.5 can be formed in the atmosphere from gases such as SO_2, NO_X, and VOC. Inhalable particulate matter, or PM10, is about 1/7 the thickness of a human hair. Major sources of PM10 include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and

brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

PM2.5 and PM10 pose a greater health risk than larger-size particles. When inhaled, they can penetrate the human respiratory system's natural defenses and damage the respiratory tract. PM2.5 and PM10 can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates can cause lung damage directly. These substances can be absorbed into the blood stream and cause damage elsewhere in the body. These substances can transport absorbed gases, such as chlorides or ammonium, into the lungs and cause injury. Whereas PM10 tends to collect in the upper portion of the respiratory system, PM2.5 is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

- Lead (Pb) in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturers of batteries, paint, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phase-out of leaded gasoline reduced the overall inventory of airborne lead by nearly 95 percent. With the phase-out of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities have become lead-emission sources of greater concern.

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

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

Regulatory Setting

Federal

United States Environmental Protection Agency (USEPA).

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

As required by the CAA, NAAQS have been established for seven major air pollutants: CO, NO_2, O_3, PM2.5, PM10, SO_2, and Pb. The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are summarized in **Table IV-1**. The USEPA has classified the Los Angeles County portion of the South Coast Air Basin as nonattainment for O_3 and PM2.5, attainment for PM10, maintenance for CO, and attainment/unclassified for NO_2.

State

California Air Resources Board (ARB).

In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). ARB, which became part of the California Environmental Protection Agency in 1991, is responsible for administering the CCAA and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS, which are generally more stringent than the federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

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

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

The CCAA requires ARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as nonattainment.

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

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O_3)	1-hour	0.09 ppm (180 μg/m³)	Nonattainment	--	--
	8-hour	0.070 ppm (137 μg/m³)	/a/	0.070 ppm (137 μg/m³)	Nonattainment
Respirable Particulate Matter (PM10)	24-hour	50 μg/m³	Nonattainment	150 μg/m³	Attainment
	Annual Arithmetic Mean	20 μg/m³	Nonattainment	--	--
Fine Particulate Matter (PM2.5)	24-hour	--	--	35 μg/m³	Nonattainment
	Annual Arithmetic Mean	12 μg/m³	Nonattainment	12 μg/m³	Nonattainment
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 mg/m³)	Attainment	9 ppm (10 mg/m³)	Unclassified/ Attainment
	1-hour	20 ppm (23 mg/m³)	Attainment	35 ppm (40 mg/m³)	Unclassified/ Attainment
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm (57 μg/m³)	Attainment	53 ppb (100 μg/m³)	Unclassified/ Attainment
	1-hour	0.18 ppm (339 μg/m³)	Attainment	100 ppb (188 μg/m³)	Unclassified/ Attainment
Sulfur Dioxide (SO_2)	24-hour	0.04 ppm (105 μg/m³)	Attainment	0.14 ppm	Attainment
	1-hour	0.25 ppm (655 μg/m³)	Attainment	75 ppb (196 μg/m³)	Attainment
Lead (Pb)	30-day average	1.5 μg/m³	Attainment	--	--
	Calendar Quarter	--	--	0.15 μg/m³	Nonattainment

/a/ ARB has not determined 8-hour O_3 attainment status.
μg/m³ – micrograms per cubic meter ppm – parts per million ppb – parts per billion
Source: ARB, Ambient Air Quality Standards, and attainment status, accessed April 17, 2016 (www.arb.ca.gov/desig/adm/adm.htm)

Local

South Coast Air Quality Management District (SCAQMD).

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

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

All areas designated as nonattainment under the CCAA are required to prepare plans showing how they will meet the air quality standards. The SCAQMD prepares the Air Quality Management Plan (AQMP) to address CAA and CCAA requirements by identifying policies and control measures. On December 7, 2012, the SCAQMD adopted its 2012 AQMP. The SCAQMD's pending Draft 2016 AQMP will develop strategies to meet the NAAQS for the 8-hour ozone standard by 2032, the annual PM2.5 standard by 2021-2025, the 1-hour ozone standard by 2023, and the 24-hour PM2.5 standard by 2019.

The Southern California Association of Governments (SCAG) assists by preparing the transportation portion of the AQMP through the adoption of its Regional Transportation Plan (RTP). This includes the preparation of a Sustainable Communities Strategy (SCS) that responds to planning requirements of SB 375 and demonstrates the region's ability to attain greenhouse gas reduction targets set forth in State law.

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

City of Los Angeles

The City's General Plan includes an Air Quality Element that provides a policy framework that governs air quality planning within the City of Los Angeles. Adopted in November 1992, the Plan includes six goals, 15 objectives, and 30 policies that help define how the City will achieve its clean air goals.

In 2006, the City released its L.A. CEQA Thresholds Guide that provides guidance in the preparation of environmental documents. This included a chapter focusing on air quality. While it didn't set new thresholds of significance for air quality, it did suggest a process for evaluating projects and attempted to standardize analyses through prescribed protocols.

Air Pollution Climatology

The Project Site is located within the Los Angeles County non-desert portion of the South Coast Air Basin. The Basin is in an area of high air pollution potential due to its climate and topography. The region lies in the semi-permanent high pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The Basin experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of its perimeter. The mountains and hills within the area contribute to the variation of rainfall, temperature, and winds throughout the region.

The Basin experiences frequent temperature inversions that help to form smog. While temperature typically decreases with height, it actually increases under inversion conditions as altitude increases, thereby preventing air close to the ground from mixing with the air above. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO_2 react under strong sunlight, creating smog. Light daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland toward the mountains.

Air quality problems also occur during the fall and winter, when CO and NO_2 emissions tend to be higher. CO concentrations are generally worse in the morning and late evening (around 10:00 p.m.) when temperatures are cooler. High CO levels during the late evenings result from stagnant atmospheric conditions trapping CO. Since CO emissions are produced almost entirely from

automobiles; the highest CO concentrations in the Basin are associated with heavy traffic. NO_2 concentrations are also generally higher during fall and winter days.

Air Monitoring Data

The SCAQMD monitors air quality conditions at 45 locations throughout the Basin. The Project Site is located in SCAQMD's Northwest Coastal LA County receptor area. Historical data from the area was used to characterize existing conditions in the vicinity of the project area. **Table IV-2, 2013-2015 Ambient Air Quality Data in Project Vicinity** shows pollutant levels, State and federal standards, and the number of exceedances recorded in the area from 2013 through 2015. The one-hour State standard for O_3 was exceeded three times during this three-year period while the daily federal standard was exceeded four. CO and NO_2 levels did not exceed the CAAQS from 2013 to 2015.

Table IV-2
2012-2014 Ambient Air Quality Data in Project Vicinity

Pollutant	Pollutant Concentration & Standards	Southwest Coastal LA County		
		2013	2014	2015
Ozone	Maximum 1-hour Concentration (ppm)	0.088	0.116	0.102
	Days > 0.09 ppm (State 1-hour standard)	0	1	2
	Days > 0.075 ppm (Federal 8-hour standard)	0	4	0
Carbon Monoxide	Maximum 1-hour Concentration (ppm)	N/A	2	1.6
	Days > 20 ppm (State 1-hour standard)	N/A	0	0
	Maximum 8-hour Concentration (ppm)	1.3	1.3	1.4
	Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide	Maximum 1-hour Concentration (ppm)	0.051	0.064	0.068
	Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM_{10}	Maximum 24-hour Concentration (μg/m³)	N/A	N/A	N/A
	Days > 50 μg/m³ (State 24-hour standard)	N/A	N/A	N/A
$PM_{2.5}$	Maximum 24-hour Concentration (μg/m³)	N/A	N/A	N/A
	Days > 35 μg/m³ (Federal 24-hour standard)	N/A	N/A	N/A
Sulfur Dioxide	Maximum 24-hour Concentration (ppm)	N/A	N/A	N/A
	Days > 0.04 ppm (State 24-hour standard)	N/A	N/A	N/A

Source: SCAQMD Northwest Coastal LA County annual monitoring data (www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year) accessed April 29, 2016.
N/A: Not available at this monitoring station.

Toxic Air Pollution

According to the SCAQMD's Multiple Air Toxics Exposure Study IV (MATES IV), the incidence of cancer over a lifetime in the US population is about 1 in 4, to 1 in 3, which translates into a risk of about 300,000 in 1 million (SCAQMD 2015). One study, the *Harvard*

Report on Cancer Prevention, estimated that, of cancers associated with known risk factors, about 30 percent were related to tobacco, about 30 percent were related to diet and obesity, and about 2 percent were associated with environmental pollution related exposures (Harvard 1996). The potential cancer risk for a given substance is expressed as the incremental number of potential excess cancer cases per million people over a 70-year lifetime exposure at a constant annual average pollutant concentration. The risks are usually presented in chances per million. For example, if the cancer risks were estimated to be 100 per million, this would predict an additional 100 excess cases of cancer in a population of 1 million people over a 70-year lifetime.

As part of the SCAQMD's environmental justice initiatives adopted in late 1997, the SCAQMD adopted the MATES IV study in May 2015, which was a follow-up to the previous MATES I, II, and III air toxics studies conducted in the Basin. The MATES IV study was based on monitored data throughout the Basin and included a monitoring program, an updated emissions inventory of TACs, and a modeling effort to characterize carcinogenic risk across the Basin from exposure to TACs. The MATES IV study applied a 2-kilometer (1.24-mile) grid over the Basin and reported carcinogenic risk within each grid space (each covering an area of 4 square kilometers or 1.54 square miles). The study concluded that the average of the modeled air toxics concentrations measured at each of the monitoring stations in the Basin equates to a background cancer risk of approximately 897 in 1 million primarily due to diesel exhaust particulate matter (DPM). Using the MATES IV methodology, about 94 percent of the cancer risk is attributed to emissions associated with mobile sources, and about 6 percent of the risk is attributed to toxics emitted from stationary sources, which include industries, and businesses such as dry cleaners and chrome plating operations. The MATES IV study found lower ambient concentrations of most of the measured air toxics, as compared to the levels measured in the previous MATES III study finalized in September 2008.

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. ARB has identified the following typical groups who are most likely to be affected by air pollution: children under 14; the elderly over 65 years of age; athletes; and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

There are several sensitive receptors near the Project Site, including:

- Single family residences along Sanford Street located approximately 340 feet to the northeast of the Project Site;
- Ballona Preserve located approximately 370 feet to the west of the Project Site;
- Ballona Creek Bike Path located approximately 150 feet northwest of the Project Site;
- Westside Neighborhood School located approximately 430 feet to the south of the Project Site;
- Single -family residences along McConnell Street/Milton Street located approximately 650 feet to the north of the Project Site;
- Animo Westside Charter Middle School located approximately 1,300 feet to the southeast of the Project Site.

Where available and applicable, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

Would the project:

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

Less Than Significant Impact. The South Coast Air Quality Management District (SCAQMD) is the agency primarily responsible for comprehensive air pollution control in the South Coast Air Basin and reducing emissions from area and point stationary, mobile, and indirect sources. SCAQMD prepared the 2012 Air Quality Management Plan (AQMP) to meet federal and state ambient air quality standards. A significant air quality impact may occur if a project is inconsistent with the AQMP or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. The *State CEQA Guidelines* Section 15064.7 provides the significance criteria established by the applicable air quality management district or air pollution control district, when available, may be relied upon to make determinations of significance. The potential air quality impacts of the Proposed Project are, therefore, evaluated according to thresholds developed by the SCAQMD in their *CEQA Air Quality Handbook, Air Quality Analysis Guidance Handbook*, and subsequent guidance, which are listed below. The proposed project is not expected to conflict with or obstruct the implementation of the AQMP and SCAQMD rules. The proposed project is also subject to the City's Green Building Program Ordinance (Ord. No. 179,890), which was adopted to reduce the use of natural resources, create healthier living environments, and minimize the negative impacts of

development on local, regional and global ecosystems. Therefore, impacts would be less than significant.

The 2012 AQMP provides base year emissions and future baseline emission projections for the South Coast Air Basin. In doing so, the 2012 AQMP incorporates, in part, Southern California Association of Government's (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) 2012-2035 RTP/SCS socio-economic forecast projections of regional population and employment growth. A project would not conflict with the AQMP if it is consistent with the population, housing and employment assumptions that were used in the development of the AQMP. The levels of population for the project are consistent with population forecasts as adopted by SCAG. Therefore, the proposed project would not conflict with the AQMP, and impacts would be less than significant.

Figure IV-2 – Sensitive Receptors

Project Consistency with Air Quality Plans

SCAQMD Air Quality Management Plan. The proposed land use will neither conflict with the SCAQMD's 2016 Air Quality Management Plan (AQMP) nor jeopardize the region's attainment of air quality standards. The AQMP focuses on achieving clean air standards while accommodating population growth forecasts by the Southern California Association of Governments (SCAG). Specifically, SCAG's growth forecasts from the 2016 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) are largely built off local growth forecasts from local governments like the City of Los Angeles. The 2016 RTP/SCS accommodates up to 4,609,400 persons; 1,690,300 households; and 2,169,100 jobs in the City of Los Angeles by 2040.

The Proposed Project is a 6-story residential development, consisting of 236 residential units, recreation/open space areas, and 406 parking spaces. The Proposed Project would be isolated from other developments due to its location on a triangular shaped site on a peninsula bounded by the confluence of Ballona Creek to the north, the SR 90 Freeway to the northeast, vacant land to the east, and Centinela Creek to the south. The Project would require the extension of infrastructure including roads, sewer, storm drains, etc. to serve the subject site. The applicant proposes a private street and vehicular bridge which would provide access to the site. The project would introduce new residential units. According to SCAG's Profile of the City of Los Angeles (2016)[6], the City's average household size was 2.9 in 2016. The Proposed Project is estimated to generate approximately 685 residents based on SCAG's average household size. According to SCAG, the City had a population of 4,040,904 in 2016, and is expected to increase to 4,221,659 people by 2020[7]. The increase in residential population resulting from the Proposed Project would not be considered substantial in consideration of anticipated growth for the City, representing approximately 0.38 percent of the anticipated growth. Therefore, the Proposed Project would not directly induce substantial population growth in the project area, and impacts would be less than significant.

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6 Southern California Association of Governments' (SCAG) Profile of the City of Los Angeles, website: https://www.scag.ca.gov/Documents/LosAngeles.pdf, accessed March 12, 2018.

7 Using a 1.1 percent annual growth factor, as utilized by the California Department of Finance, E-1 Population Estimates for Cities, Counties, and the State, website: http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-1/documents/E-1_2017_InternetVersion.xls, accessed March 12, 2018.

City of Los Angeles General Plan Air Quality Element. The City's General Plan Air Quality Element identifies 30 policies that identify specific strategies for advancing the City's clean air goals. As illustrated in **Table IV-3**, **Project Consistency with City of Los Angeles General Plan - Air Quality Element** the Proposed Project does not conflict with the applicable policies related to air quality in the General Plan. As such, the Proposed Project's impact on the City's General Plan would be considered less than significant. No further analysis is necessary.

Table IV-3
Project Consistency with City of Los Angeles General Plan - Air Quality Element

Strategy	Project Consistency
Policy 1.3.1. Minimize particulate emissions from construction sites.	**No Conflict.** The Proposed Project would minimize particulate emissions during construction through best practices required by SCAQMD Rule 403 (Fugitive Dust).
Policy 1.3.2. Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	**No Conflict.** The Proposed Project would minimize particulate emissions from unpaved facilities through best practices required by SCAQMD Rule 403 (Fugitive Dust).
Policy 2.1.1. Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**No Conflict.** The Proposed Project does not include a commercial component. However, the proposed parking structure has provisions for carpool/vanpool vehicle reserved parking. The TDM&MP includes a privately funded fixed route shuttle that would provide drop off and pick up service to nearby transit stations, entertainment and work centers.
Policy 2.1.2. Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	**Not Applicable.** The Proposed Project is a residential development that doesn't include a commercial component.
Policy 2.2.1. Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	**Not Applicable.** The Proposed Project is a residential development that doesn't include a commercial component.
Policy 2.2.2. Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	**No Conflict.** The Proposed Project is a residential development that doesn't include a commercial component.
Policy 2.2.3. Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.	**Not Applicable.** The Proposed Project does not include special events that would require traffic management.
Policy 3.2.1. Manage traffic congestion during peak hours.	**No Conflict.** The Proposed Project would minimize traffic impacts below significance thresholds with mitigation measures.

Table IV-3 **Project Consistency with City of Los Angeles General Plan - Air Quality Element**	
Strategy	**Project Consistency**
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	**No Conflict.** The Proposed Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Los Angeles County Metropolitan Transportation Authority, and other regional agencies on the coordination of land use, air quality, and transportation policies.
Policy 4.1.2. Ensure that project level review and approval of land use development remains at the local level.	**No Conflict.** The Proposed Project would be entitled and environmentally cleared at the local level.
Policy 4.2.1. Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.	**No Conflict.** The Proposed Project requests a General Plan Amendment to develop a vacant isolated site that is designated for industrial uses into a residential development. The site is adjacent to an urbanized neighborhood and served by bus transit. The Project's impacts were analyzed in Section 16, Transportation and Traffic, and mitigation measures are imposed where necessary to ensure that impacts are less than significant.
Policy 4.2.3. Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**No Conflict.** The Proposed Project would be located on an isolated vacant site that is adjacent to an urbanized neighborhood and served by bus transit. The Proposed Project will construct a vehicular bridge and pedestrian/bicycle bridge to provide access to the site.
Policy 4.2.4. Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**No Conflict.** The Proposed Project's air quality impacts have been analyzed (CalEEMod output report in Appendix A) and minimized through the environmental review process.
Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	**No Conflict.** The Proposed Project would be located on an isolated vacant site that currently does not have vehicular access. The Project will construct a vehicular bridge to allow vehicular access to the site. However, the Project's impacts were analyzed in Section 16, Transportation and Traffic, and mitigation measures are imposed where necessary to ensure that impacts are less than significant. The TDM&MP and pedestrian improvements and bicycle amenities encourage users of the site to arrive on foot or bicycle.
Policy 4.3.1. Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to minimize significant health risks posed by air pollution sources.	**No Conflict.** The Proposed Project requests a General Plan Amendment to develop a vacant isolated site that is designated for industrial uses for residential development. The Proposed Project locates new residential development on a vacant site that is directly adjacent to the SR-90 Freeway, however a Health Risk Assessment (Appendix G) indicates that health risk impacts to future on-site residents from exposure of TAC

Table IV-3 **Project Consistency with City of Los Angeles General Plan - Air Quality Element**	
Strategy	**Project Consistency**
	emissions from the SR-90 Freeway would not exceed thresholds.
Policy 4.3.2. Revise the City's General Plan/Community Plans to ensure that new or relocated major air pollution sources are located to minimize significant health risks to sensitive receptors.	**No Conflict.** The Proposed Project requests a General Plan Amendment to develop a vacant isolated site. The Proposed Project locates new residential development on a vacant site that is approximately 400 feet from a single-family neighborhood, however air quality analysis (Appendix A) indicates no impacts.
Policy 5.1.1. Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's water port and airport facilities.
Policy 5.1.2. Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	**Not Applicable.** This policy calls for cleaner operations of the City's buildings and operations.
Policy 5.1.3. Have the Department of Water and Power make improvements at its in-basin power plants in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's Water and Power energy plants.
Policy 5.1.4. Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	**Not Applicable.** This policy calls for City facilities to reduce solid waste and energy consumption.
Policy 5.2.1. Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.	**Not Applicable.** This policy calls for the City to gradually reduce the fleet emissions inventory from its vehicles through use of alternative fuels, improved maintenance practices, and related operational improvements.
Policy 5.3.1. Support the development and use of equipment powered by electric or low-emitting fuels.	**No Conflict.** The project would be designed to meet the applicable requirements of the State's Green Building Standards Code and the City of Los Angeles' Green Building Code.
Policy 6.1.1. Raise awareness through public-information and education programs of the actions that individuals can take to reduce air emissions.	**Not Applicable.** This policy calls for the City to promote clean air awareness through its public awareness programs.
Source: Impact Sciences, April 2017	

As demonstrated by the analysis, the air quality impacts of this development on the Project Site are accommodated in the region's emissions inventory for the 2016 RTP/SCS and 2016 AQMP. The project is therefore not expected to conflict with or obstruct implementation of the AQMP, and any impact on the Plan would be considered less than significant. Similarly, the Proposed Project does not conflict with the City's General Plan Air Quality Element's goals, policies, or objectives. Project impacts would be less than significant. No further analysis is necessary.

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

Less Than Significant Impact. A project may have a significant impact if project-related emissions would exceed federal, State, or regional standards or thresholds, or if project-related emissions would substantially contribute to an existing or projected air quality violation. As previously discussed, the Proposed Project is located within the SCAQMD jurisdiction.

Construction Phase Air Quality Impacts on Regional Air Quality

Project construction and operation emissions were estimated using California Emissions Estimator Model (CalEEMod) 2016.3.1 model, a statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both construction and operations from land use projects. Construction-related emissions were estimated using the SCAQMD's CalEEMod 2016.3.1 model (included as **Appendix A** of this Initial Study) using assumptions from the Project Applicant. The Project Site features two main components. First, a bridge is to be constructed over approximately 30 weeks. This bridge is to be constructed to connect Beethoven Street with the Project Site. The bridge will provide access to the Project Site for both construction and operation. Following construction of the bridge, construction on the Project Site would begin, lasting approximately two years. **Table IV-4, Proposed Construction Schedule** summarizes the proposed construction schedule that was modeled for air quality impacts.

Table IV-4
Proposed Construction Schedule

Phase	Duration /a/
Site Preparation (Bridge)	14 Weeks
Construction (Bridge)	20 Weeks
Paving (Bridge)	1 Week
Site Preparation (Project Site)	58 Weeks
Grading (Project Site)	3 Weeks
Construction (Project Site)	131 Weeks
Paving (Project Site)	9 Weeks
Architectural Coating	9 Weeks

/a/ - All durations approximate.
Source: Impact Sciences, 2018

As shown in **Table IV-5**, **Estimated Daily Construction Emissions - Unmitigated** the construction of the Proposed Project will produce VOC, NO_x, CO, SO_x, PM10 and PM2.5 emissions that do not exceed the SCAQMD's regional thresholds. As a result, construction of the Proposed Project would not contribute substantially to an existing violation of air quality

standards for regional pollutants (e.g., ozone). This impact is considered less than significant. No further analysis is necessary.

Table IV-5
Maximum Estimated Daily Construction Emissions - Unmitigated

Construction Phase	Pounds Per Day					
	VOC	NOx	CO	SOx	PM10	PM2.5
Year 1	4	67	26	<1	8	4
Year 2	4	22	24	<1	3	2
Year 3	29	21	23	<1	3	1
Maximum Regional Total	29	67	26	<1	8	4
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	***No***	***No***	***No***	***No***	***No***	***No***
Maximum Localized Total	29	24	16	<1	7	4
Localized Significance Threshold	--	172	1,990	--	40	11
Exceed Threshold?	***N/A***	***No***	***No***	***N/A***	***No***	***No***

Source: Impact Sciences, 2017 based on CalEEMod 2016.3.1 model runs, included as Appendix .A LST analyses based on 2.98 acre site with 100 meter distances to receptors in Northwest Coastal LA County source receptor area.

Construction Phase Air Quality Impacts on Local Air Quality

In terms of local air quality, the Proposed Project would produce significant emissions that do not exceed the SCAQMD's recommended localized standards of significance for NO_2, CO, PM10, and PM2.5 during the construction phase. As a result, construction impacts on localized air quality are considered less than significant.

It should be noted that the SCAQMD would regulate fugitive dust emissions of PM10 and PM2.5 through SCAQMD Rule 403, which calls for Best Available Control Measures (BACM) that include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. These are described below in **Regulatory Compliance Measure RCM-AQ-1**. It should also be noted that **Table IV-5** conservatively does *not* assume the application of BACMs to control fugitive dust.

Regulatory Compliance Measure

RCM-AQ-1 A Construction Management Plan (CMP) is required to control fugitive dust and to comply with SCAQMD minimum requirements and Rule 403 to control dust.

The CMP shall specify measures to be implemented, which may include the following:

- Limit soil disturbance to the amounts analyzed in this air quality analysis.
- The Applicant shall limit on-site construction vehicle speeds to no more than 15 miles per hour to reduce dust.
- Soil disturbing activities shall be terminated when wind gusts exceed 25 miles per hour.
- Areas that are to undergo earthmoving shall be watered to the depth of excavation prior to soil disturbance and daily watering shall be ongoing at least three times per day or as otherwise necessary to prevent fugitive dust.
- Soil stabilizers shall be applied to inactive areas according to manufacturer specifications (previously graded areas inactive for 10 days or more).
- All stockpiles shall be covered with tarps before rain or wind events.
- Vegetative cover landscaping shall be established on all disturbed areas as soon as possible to prevent long-term wind or water erosion.
- Require the use of a gravel apron or other equivalent methods to reduce mud and dirt track-out onto truck exit routes
- All trucks hauling soil or other loose earthen materials shall be covered or shall maintain at least 12 inches of freeboard.
- The Applicant shall designate an on-site construction relations officer to act as community liaison to address dust concerns of the neighborhood residents.

Construction of the Proposed Project is not expected to produce any local violation of air quality standards or contribute substantially to an existing or projected air quality violation. Project impacts would be less than significant and no further analysis is required.

Operation Phase Air Quality Impacts

The project will also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project Site. Additional emissions would be generated by area sources, such as energy use and landscape maintenance activities. Operational emissions would not exceed SCAQMD's regional significance thresholds for VOC, NOX, CO, PM10 and PM2.5 emissions (**Table IV-6, Estimated Daily Operations Emissions - Unmitigated**). As a result, the project's operational impacts on regional air quality are considered less than significant.

With regard to localized air quality impacts, the Proposed Project would emit minimal emissions of NO2, CO, PM10, and PM2.5 from area and energy sources on-site. As shown in **Table IV-6**, these localized emissions would not approach the SCAQMD's localized significance thresholds that signal when there could be human health impacts at nearby sensitive receptors during long-term operations. The project's operational impacts on localized air quality are considered less than significant.

Table IV-6
Estimated Daily Operations Emissions - Unmitigated

Emission Source	Pounds per Day					
	VOC	NOx	CO	SOx	PM10	PM2.5
Area Sources	6	<1	20	<1	<1	<1
Energy Sources	<1	1	<1	<1	<1	<1
Mobile Sources	3	15	45	<1	12	3
Total Regional Total	**10**	**16**	**65**	**<1**	**12**	**3**
Regional Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	***No***	***No***	***No***	***No***	***No***	***No***
Localized Total	**6**	**1**	**20**	**<1**	**<1**	**<1**
Localized Significance Threshold	**-**	**147**	**827**	**-**	**2**	**1**
Exceed Threshold?	***N/A***	***No***	***No***	***N/A***	***No***	***No***

Source: Impact Sciences, 2017 based on CalEEMod 2016.3.1 model runs, included as Appendix A. LST analyses based on 2.98 acre site with 100 meter distances to receptors in Northwest Coastal LA County source receptor area.

The long-term operation of the Proposed Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation for regional and localized air quality. Project impacts would be less than significant and no further analysis is required.

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

Less than Significant Impact. A significant impact may occur if a project would add a considerable cumulative contribution to federal or State non-attainment pollutant.

Construction Phase Air Quality Impacts

Construction of the Proposed Project would not contribute significantly to cumulative emissions of pollutants for any non-attainment pollutants.

For regional ozone precursors, the project would not exceed SCAQMD mass emission thresholds for ozone precursors during construction. As such, the project's impact on cumulative ozone precursor emissions would be considered less than significant.

Similarly, regional emissions of PM10 and PM2.5 would not exceed mass thresholds established by the SCAQMD; therefore, construction emissions impacts would be considered less than significant.

When considering local impacts, cumulative construction emissions are considered when projects are within close proximity of each other that could result in larger impacts on local sensitive receptors. If any other Proposed Projects were to undertake construction concurrently with the Proposed Project, localized CO, PM2.5, PM10, and NO_2 concentrations would not exceed ambient air quality standards at nearby receptors. The application of localized significance thresholds (LSTs)[8] to each cumulative project in the local area would help ensure that each project does not produce localized hotspots of CO, PM2.5, PM10, and NO_2. Any projects that would exceed LSTs would perform dispersion modeling to confirm whether health-based air quality standards would be violated and mitigate any significant localized emissions accordingly. Receptors that are located further away would not be threatened with exceedances of health-based standards, and emissions significantly disperse as a function of atmospheric stability, mixing heights, and other variables, with distance a critical factor. The SCAQMD's LSTs recognize the influence of a receptor's proximity, setting LST mass emissions thresholds for PM10 that generally double with every doubling of distance. As such, the cumulative impact of construction projects on local sensitive receptors would be considered less than significant.

Construction of the project would not produce cumulative considerable emissions of localized nonattainment pollutants PM10 and PM2.5, as the anticipated emissions would not exceed LSTs set by the SCAQMD. This is considered a less than significant impact.

Construction of the Proposed Project would not have any considerable contribution to cumulative impacts on pollutant concentrations at nearby receptors. Project impacts would be less than significant and no further analysis is required.

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8 The SCAQMD has developed localized significance threshold (LST) look-up tables for project sites that are one, two, and five acres in size to simplify the evaluation of localized emissions at small sites. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), project, size, distance to the sensitive receptor, etc. Lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses.

Operation Phase Air Quality Impacts

As for cumulative operational impacts, the proposed land use will not produce cumulatively considerable emissions of nonattainment pollutants at the regional or local level. Because the project's air quality impacts would not exceed the SCAQMD's operational thresholds of significance as noted in **Table IV-6**, the project's impacts on cumulative emissions of non-attainment pollutants is considered less than significant. As a result, its localized emissions of PM10 and PM2.5 would be minimal. Similarly, existing land uses in the area include residential, commercial, and industrial land uses that do not produce substantial emissions of localized nonattainment pollutants. A project of this size (236 units) would not likely exceed the project-level SCAQMD LSTs for criteria air pollutants and the impact would be less than significant. Long-term operation of the project would not result in a cumulatively considerable net increase of any non-attainment criteria pollutant. Project impacts would be less than significant and no further analysis is required.

d) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. Based on the City of Los Angeles CEQA Thresholds Guide, a significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. SCAQMD protocol utilizes localized CO concentrations from motor vehicles and localized concentrations of NOx, CO, PM10, and PM2.5 from construction and operation to determine localized pollutant concentration potential. Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the population at large. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, child care centers, and athletic facilities.[9] The SCAQMD has developed localized significance thresholds (LSTs) that are based on the amount of maximum daily localized construction emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These apply to projects that are less than or equal to five acres in size and are only applicable to Respirable Particulate Matter (PM10 and PM2.5), Carbon Monoxide (CO), and Nitrogen Oxides (NOx).

Construction Phase Air Quality Impacts on Sensitive Receptors

As shown **on Figure IV-2**, construction of the Proposed Project could produce air emissions that impact several existing sensitive receptors near the Project Site, including:

9 SCAQMD CEQA Air Quality Handbook, 1993, page 5-1.

- Single family residences along Sanford Street located approximately 340 feet to the northeast of the Project Site;
- Ballona Preserve located approximately 370 feet to the west of the Project Site;
- Ballona Creek Bike Path approximately 150 feet northwest of the Project Site;
- Westside Neighborhood School located approximately 430 feet to the south of the Project Site;
- Single –family residences along McConnell Street/Milton Street located approximately 650 feet to the north of the Project Site;
- Animo Westside Charter Middle School located approximately 1,300 feet to the southeast of the Project Site.

As illustrated in **Table IV-6**, these nearby receptors would not be exposed to substantial concentrations of localized pollutants PM10 and PM2.5 from construction of the Proposed Project. Specifically, construction activities would not exceed SCAQMD LST thresholds for PM10 and PM2.5 and represent a less than significant impact. LST thresholds represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable ambient air quality standard.

Construction of the Proposed Project would not have any significant impacts on pollutant concentrations at nearby receptors. Project impacts would be less than significant and no further analysis is required.

Operation Phase Air Quality Impacts on Sensitive Receptors

The Proposed Project would generate long-term emissions from mobile sources that would generate relatively small pollutant concentrations of CO, NO_2, PM2.5, or PM10 at sensitive receptors and would be considered less than significant.

Long-term operations of the project would not result in exceedances of CO air quality standards at roadways in the area. This is due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the project would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot.

Screening analysis guidelines for localized CO hotspot analyses from Caltrans recommend that projects in CO attainment areas focus on emissions from traffic intersections where air quality may get worse.[10] Specifically, projects that significantly increase the percentage of vehicles operating in cold start mode, significantly increase traffic volumes, or worsen traffic flow should be considered for more rigorous CO modeling. According to the traffic study for the Proposed Project, incorporation of the Transportation Demand Management and Monitoring Program, defined in the report, would reduce level of service impacts to less than significant and not worsen traffic flow.[11] In addition, the project would not significantly increase the percentage of vehicles operating in cold start mode or substantially worsen traffic flow.

Finally, the project would not result in any substantial emissions of TACs during the construction or operations phase. During the construction phase, the primary air quality impacts would be associated with the combustion of diesel fuels, which produce exhaust-related particulate matter that is considered a toxic air contaminant by ARB based on chronic exposure to these emissions.[12] However, construction activities would not produce chronic, long-term exposure to diesel particulate matter. During long-term project operations, the project does not include typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. As a result, the project would not create substantial concentrations of TACs. In addition, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.[13] The project would not generate a substantial number of truck trips. Based on the limited activity of TAC sources, the project would not warrant the need for a health risk assessment associated with on-site activities. Therefore, project impacts related to TACs would be less than significant.

Long-term operation of the Proposed Project would not have any significant impacts on pollutant concentrations at nearby receptors. Project impacts would be less than significant.

The California Air Resources Board (CARB) has published guidance for locating new sensitive receptors (e.g., residences) away from nearby sources of air pollution. Relevant recommendations include avoiding siting new sensitive land uses within 500 feet of a freeway or 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per

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10 Caltrans, Transportation Project-Level Carbon Monoxide Protocol, updated October 13, 2010.

11 KOA Corporation, Traffic Study for Del Rey Pointe, March, 2017.

12 California Office of Environmental Health Hazard Assessment. Health Effects of Diesel Exhaust, website: www.http://oehha.ca.gov/public_info/facts/dieselfacts.html, accessed July 20, 2017.

13 SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.

year or greater). While the proposed project will be adjacent to the SR 90 Freeway, a Health Risk Assessment prepared by Impact Sciences, Inc. dated June 2017 (**Appendix G**) confirms that based on an exposure duration of 30 years, health risk impacts to future on-site residents from exposure of TAC emissions from the SR-90 freeway would not exceed thresholds. As such, no mitigation measures are required. Additionally, the project would comply with the City of Los Angeles Green Building Code which requires mechanical filtration rated MERV 13. The Project would be consistent with the City's Advisory Notice for Freeway-Adjacent Projects. Therefore, the proposed project would be consistent with the CARB recommendations for locating new sensitive receptors. Therefore, the proposed project would result in a less-than-significant impact.

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

Less Than Significant Impact. Potential sources that may emit odors during the construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the Project Site. Development of the Proposed Project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Additionally, the odors would be temporary, and construction activity would be required to comply with SCAQMD Rule 402.[14] A less than significant impact relative to an odor nuisance would occur during construction associated with the Proposed Project.

According to the SCAQMD *California Environmental Quality Act (CEQA) Air Quality Handbook*, land uses that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.[15] The Proposed Project would not include any of these odor-producing uses; odors associated with project operation would be limited to on-site waste generation and disposal and occasional minor odors generated during food preparation activities for the on-site residential development. Furthermore, all trash receptacles would be covered and properly maintained in a manner as to minimize odors, as required by City and Los Angeles County Health Department regulations, and be emptied on a regular basis. Therefore, the implementations of the Proposed Project would not generate objectionable odors affecting a substantial number of people. Impacts related to odors would be less than significant, and no further analysis is required.

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14 *SCAQMD Rule 402 states the following "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.*

15 *South Coast Air Quality Management District, CEQA Air Quality Handbook; http://www.aqmd.gov/ceqa/hdbk.html, December 11, 2015.*

4. BIOLOGICAL RESOURCES

This section is based on the information provided in the Biological Technical Report prepared by NOREAS Inc., dated November 2015 (Bio Report). The Bio Report, including all calculation data is incorporated herein by this reference, and provided in **Appendix B-1** to this Draft Initial Study.

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 regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. A significant impact would occur of a project were to 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 regulations, or by the state or federal regulatory agencies cited above. The Proposed Project site and vicinity are located in a heavily developed area of Los Angeles immediately adjacent to the SR 90 Freeway. As discussed in the Bio Report, more than 97 percent of the project footprint would occur in areas of developed, disturbed, and non-native land cover types. Furthermore, greater than 60 percent of the flora found within the Project Site are non-native species. The Project Site is not located within any U.S. Fish and Wildlife Service (USFWS)-designated critical habitat, Significant Ecological Areas, or Coastal Resource Areas within Los Angeles County[16]; and no state- or federally-listed species have been detected within its boundaries. The site abuts the SR 90 Freeway to the northeast, and is otherwise surrounded by commercial and residential development. To that end, implementation of the project would not be expected to have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife (CDFW) or the USFWS as the Proposed Project site supports no habitat for such species. Therefore, the Proposed Project would have no impact on any sensitive species or habitat. No further analysis is required.

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

No Impact. A significant impact would occur if any riparian habitat or natural community would be lost or destroyed as a result of urban development. The Proposed Project's disturbance

[16] Los Angeles County Department of Regional Planning - Existing Significant Ecological Areas and Coastal Resource Area total 480,745 acres (Los Angeles County 2015).

footprint has been characterized in the Bio Report as an upland, which is isolated from outlets, connections to surface or ground water resources, saline waters, and navigable waters. The project site does not contain any riparian habitat and does not contain any streams or water courses necessary to support riparian habitat. Furthermore, no riparian habitats, bed, bank, channel, or well-defined ordinary high water marks were observed within the Project Site. Additionally, the Project Site is not located within any USFWS-designated critical habitat, Significant Ecological Areas, or Coastal Resource Areas within Los Angeles County. Accordingly, the Proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or the USFWS, and no further analysis is required.

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?

No Impact. A significant impact would occur if federally protected wetlands would be modified or removed by a project. Although the site is adjacent to the Centinela and Ballona Creek, the project site does not contain any federally protected wetlands, wetland resources, or other waters of the United States as defined by Section 404 of the Clean Water Act. The Proposed Project's disturbance footprint has been characterized in the Bio Report as an upland, which lacks the presence of any wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) or special aquatic resource areas. A Delination of Waters and Wetlands study was prepared by NOREAS dated February 2016 which confirms no loss or impacts per the Clean Water Act (see **Appendix B-2**). The Proposed Project's disturbance footprint is isolated from outlets, connections to surface or ground water resources, saline waters, and navigable waters as well. As such, implementation of the Proposed Project's would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act as a consequence of direct removal, filling, hydrological interruption, or other means, and no further analysis is required.

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?

Less Than Significant Impact. A significant impact would occur if a project were to interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites.

The findings of the Bio Report indicate that the Proposed Project site is not located within an established wildlife movement corridor. Additionally, the site is not a known wildlife nursery site. The preponderance of the flora found within Project Site limits are non-native species. The Project Site is not located within any USFWS-designated critical habitat, Significant Ecological Areas, or Coastal Resource Areas within Los Angeles County. The site abuts the SR 90 Freeway to the northeast, and is otherwise surrounded by commercial and residential development. The Proposed Project site is lacking in both numbers and variety of species – likely attributable to its inability to produce a high enough density of biomass to support a robust population of native plants and animals. Additionally, the Proposed Project site location between highways and well-traveled roads and its proximity to residential and commercial development have greatly reduced its ability to support both native resident and migratory species. These disturbances have substantially decreased the Proposed Project site's value as suitable breeding and foraging habitat, and as a migration corridor or overland dispersal habitat; as these lands are severely movement-constrained. The more factors that constrain species habitats and dispersal / movement corridors, the less likely individuals are to occur, or continue to occur within a specific locale. Furthermore, the Proposed Project site does not to connect large blocks of natural open space that are considered essential for long-term plant and wildlife viability in Los Angeles County.

However, a number of mature trees are scattered across the Project Site (40 red gums *(Eucalyptus camalduensis)*, and one Mexican fan palm *(Washingtonia robusta)*. The red gum trees will remain, and the palm will be removed. Although the trees are all ornamental and nonnative, they may provide suitable habitat, including nesting habitat, for migratory birds. The Migratory Bird Treaty Act of 1918 (MBTA) implements the United States' commitment to four treaties with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. The USFWS administers permits to take migratory birds in accordance with the MBTA. These are described below in **Regulatory Compliance Measure RCM-BIO-1**. Adherence to the MBTA regulations would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to any nesting birds if found. With adherence to the MBTA requirements as outlined in RCM-BIO-1, impacts would be less than significant and no further analysis is required.

Regulatory Compliance Measure

RCM-BIO-1 To avoid impacting nesting birds, special status birds and/or raptors protected under the MBTA, one of the following must be implemented:

- Conduct vegetation removal and other demolition or ground disturbance activities associated with construction during September through January, when birds are not nesting. If feasible, initiate tree removal, vegetation clearing and grading activities prior to the breeding season (generally February 1st through August 31st) and keep disturbance activities constant throughout the spring to prevent birds from establishing nests in surrounding habitat in order to avoid abandonment of eggs or young if nesting establishes prior to construction activities; or
- Conduct pre-construction surveys for nesting birds if construction is to take place during the nesting season. A qualified wildlife biologist shall conduct a pre-construction survey no more than 30 days prior to initiation of tree removal or grading to provide confirmation on presence or absence of active nests in the vicinity (at least 300 feet around the Project Site).
- If active nests are encountered, species-specific measures shall be prepared by a qualified biologist in consultation with the CDFW and implemented to prevent abandonment of the active nest. At a minimum, tree removal and grading in the vicinity of the nest shall be deferred until the young birds have fledged. A minimum exclusion buffer of 50 feet for songbird nests, 100 feet for special status songbird nests, and 200 to 500 feet for raptor nests, shall be maintained during construction depending on the species and location. The perimeter of the nest-setback zone shall be fenced or adequately demarcated with staked flagging at 20-foot intervals, and construction personnel and activities restricted from the area.
- A survey report by the qualified biologist verifying that the young have fledged shall be maintained in the project file, and submitted to the City of Los Angeles upon request. The qualified biologist shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur.

Therefore, the proposed project would not interfere with wildlife movement or impede the use of native wildlife nursery sites, and no impact would occur.

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

Less Than Significant Impact. A project-related significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance, 177,404 (Chapter IV, Article 6 of the Los Angeles Municipal Code), which defines protected trees as:

> Any of the following Southern California native tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree*:*
>
> - *Oak trees including Valley Oak (Quercus lobata) and California Live Oak (Quercus agrifolia), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (Quercus dumosa),*
> - *Southern California Black Walnut (Juglans californica* var. *californica),*
> - *Western Sycamore (Platanus racemosa), and*
> - *California Bay (Umbellularia californica).*

The findings of the Bio Report indicate that the Proposed Project site does not contain any of the protected species.

However, although the Project Site does not support protected tree species, it does support 41 existing mature, non-protected trees (40 red gums (*Eucalyptus camalduensis)*, and one Mexican fan palm (*Washingtonia robusta),* all in fair to poor condition)[17], many of which are over 8-inches in diameter at breast height (DBH). Only one of these trees (fan palm) would be removed for construction of the Proposed Project. It is the City's policy to require the replacement of existing mature (defined as having a DBH of 8-inches or more) non-protected trees removed at development sites at a 1:1 ratio with a minimum 24-inch box size tree. Further, per the City's Street Tree Policies, the City Department of Public Works, Urban Forestry Division's policy is to replace street trees removed during a construction project. Therefore, prior to the issuance of a grading permit, during plan check review, in compliance with the LAMC and policies, a landscape plan shall be submitted for approval by the Department of City Planning and the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. The landscape plan shall demonstrate the minimum replacement ratio of 1:1 for the existing,

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17 Arborist Report for 5000 Beethoven Street, prepared by William R. McKinley, Consulting Arborist, dated May 12, 2016, included as Appendix B-3 of this Initial Study.

significant street trees and meet the requirements of the City of Los Angeles Landscape Ordinance No. 170,978. Further, removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. A Tree Removal Permit and a subsequent Tree Planting Permit would be required prior to the issuance of a Certificate of Occupancy, to certify that all new trees in the public right-of-way are provided per the current standards of the Urban Forestry Division of the Bureau of Street Services, Department of Public Works.

Following the implementation of **Regulatory Compliance Measure RCM-BIO-2**, which outlines the City's standard policies and procedures, impacts would be less than significant and no further analysis is required

Regulatory Compliance Measure

RCM-BIO-2 The Project Applicant shall replace all mature trees at the Project Site which are removed for the redevelopment at a 1:1 ratio. The specific implementation programs are as follows:

- Prior to the issuance of a grading permit, a plot plan prepared by a tree expert, as defined by the City of Los Angeles Ordinance Nos. 170,978 and 177,404, indicating the location, size, type, and condition of all existing trees on the site shall be submitted for approval by the Department of City Planning and the Urban Forestry Division of the Bureau of Street Services.
- The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Additional measures such as replacement of mature trees removed by the project, on a 1:1 basis, with minimum of 24-inch box trees on the site, shall be required for the unavoidable loss of desirable trees on the site, to the satisfaction of the Urban Forestry Division of the Bureau of Street Services and the Advisory Agency. All trees in the public right-of-way shall be provided per the current Urban Forestry Division standards.
- The genus or genera of the tree(s) shall provide a minimum crown of 30'-50'. Please refer to City of Los Angeles Landscape Ordinance (Ord. No. 170,978), Guidelines K – Vehicular Use Areas.

The proposed project would be required to comply with the provisions of the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFGC). Both the MBTA and CDFW protects migratory birds that may use trees on or adjacent to the project site for nesting, and may be disturbed during construction of the proposed project. Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands), and no impacts would occur.

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

No Impact. The findings of the Bio Report indicate that the Proposed Project site and the surrounding vicinity are not part of any adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. Therefore, construction and operation of the Proposed Project would have no impact on any such plans. No further analysis is required.

5. CULTURAL RESOURCES

This section is based on the information provided in the California Historical Resources Information System (CHRIS) search report from the South Central Coastal Information Center dated December 22, 2017, Cultural Resources Evaluation Letter prepared by ASM Affiliates dated January 4, 2019, and Sacred Lands File (SLF) search report from the Native American Heritage Commission dated October 24, 2017. The CHRIS and SLF Reports and Cultural Resources Evaluation Letter are incorporated herein by this reference, and provided in **Appendix E** to this Draft Initial Study.

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

No Impact. A project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.[18] Section 15064.5 of the *State CEQA Guidelines* defines a historical resource as (1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or (3) an object, building, structure, site, area, place, record or manuscript that a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. As previously discussed, the Project Site is currently vacant. The Project Site has not been determined to be eligible for listing in the National Register of Historic Places, California Register of Historical Resources, the Los Angeles Historic-Cultural Monuments Register, and/or any local register, and is not located in a City of Los Angeles Historic Preservation Overlay Zone and does not contain any site, building, or structure listed as a Los Angeles Historic-Cultural Monument (HCM), on SurveyLA, the citywide survey of Los Angeles or the City's HistoricPlacesLA website.[19] [20] The Proposed Project would not cause any substantial adverse change in the immediate surroundings such that the significance of the historical resource would be materially

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18 *California Public Resources Code Section 21084.1*

19 *Los Angeles Department of City Planning, Office of Historic Resources, Designated Historic-Cultural Monuments http://www.preservation.lacity.org/files/HCMDatabase %23072213_0.pdf, accessed December 11, 2016.*

20 *City of Los Angeles Department Of City Planning, Zoning/Property Info (ZIMAS), http://zimas.lacity.org/, accessed December 14, 2016.*

impaired and impacts would be less than significant. As such, no adverse impact to historical resources would occur, and no further analysis is required.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant Impact. A significant impact would occur if a known or unknown archaeological resource would be removed, altered, or destroyed as a result of the proposed development. Section 15064.5 of the *State CEQA Guidelines* defines significant archaeological resources as resources which meet the criteria for historical resources, or resources which constitute unique archaeological resources. A project-related significant impact could occur if a project would significantly affect archaeological resources that fall under either of these categories.A Sacred Lands File Search was conducted through the Native American Heritage Commission, which confirmed negative results in correspondence dated October 24, 2017. A records search completed by the South Central Coastal Information Center of the California Historical Resources Information System (CHRIS) dated December 22, 2017 included a review of all recorded archaeological and built-environment resources as well as a review of cultural resource reports on file. In addition, the California Points of Historical Interest (SPHI), the California Historical Landmarks (SHL), the California Register of Historical Resources (CAL REG), the National Register of Historic Places (NRHP), the California State Historic Properties Directory (HPD), and the City of Los Angeles Historic-Cultural Monuments (LAHCM) listings were reviewed for the Project Site. The CHRIS search determined there were several archaeological resources within a one-half mile radius of the subject site, and recommended an archaeological survey by a qualified archeologist prior to the approval of project plans. A Cultural Resources Evaluation Letter was subsequently prepared by ASM Affiliates dated January 4, 2019, to summarize the literature review and pedestrian archaeological survey. The technical report identified 26 previous reports and 8 resources within a 0.5-mile radius of the site, none of which were within 0.25-mile radius of the site, and indicated that the resources are prehistoric and historic in nature. The technical report concludes that no archaeological resources were identified within the project area.

The Project Site is located in a highly developed area of the City and has been previously disturbed and developed. However, construction of the Proposed Project will include excavation for a parking garage that could involve grading and excavation to greater depths than previously undertaken. Project-related grading and excavation activities could disturb unknown archaeological resources buried in site soils. In the event of an unexpected disturbance, significant impacts to archaeological resources could occur.

All development would be subject to the numerous laws and regulations, including, but not limited to, Section 21083.2 of the Public Resources Code (PRC) and CEQA Guidelines Section 15064.5, that require State, and local agencies to consider the effects of a Proposed Project on potentially buried cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies. They provide guidance concerning analytical techniques and approaches to defining compliance measures where potentially significant impacts may occur. If archaeological resources are discovered during excavation, grading, or construction activities, , the Applicant must notify the City of Los Angeles Planning Department immediately and work must stop within a 100-foot radius until a qualified archeologist to be approved by the City, has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Per regulatory compliance measures, Personnel of the proposed Modified Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project Site. If the find is determined by the qualified archeologist to be a unique archeological resource, as defined by Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2 of the Public Resources Code. If the find is determined not to be a unique archeological resource, no further action is necessary and construction may continue. The Applicant shall bear the cost of implementing these measures. Compliance with these protocols would reduce impacts to a less than significant level. No further analysis of this topic is necessary.

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

Less Than Significant Impact. A significant impact would occur if excavation or construction activities associated with the proposed project would disturb paleontological or unique geological features. Paleontological resources include fossil remains or traces of past life forms, including both vertebrate and invertebrate species, as well as plants. Paleontological resources are generally found within sedimentary rock formations.

As discussed above in **Section 5(b),** the Project Site is currently vacant but located in a highly developed area of the City that has been previously disturbed and developed. Buildout of the Proposed Project, specifically the construction of the subterranean parking garage, could involve grading and excavation to greater depths than previously undertaken. Project-related grading and excavation activities could disturb unknown paleontological resources buried in site soils. In

the event of an unexpected disturbance, significant impacts to archaeological resources could occur.

All development would be subject to the numerous laws and regulations, including, but not limited to, PRC Section 5097.5 and Section 622.5 of the California Penal Code[21], that require State, and local agencies to consider the effects of a Proposed Project on potentially buried paleontological resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies. They provide guidance concerning analytical techniques and approaches to defining appropriate actions where potentially significant impacts may occur. If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. The Applicant shall bear the cost of implementing these measures. Compliance with these protocols would reduce impacts to a less than significant level. No further analysis of this topic is necessary.

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

Less Than Significant Impact. A significant impact would occur if previously interred human remains would be disturbed during excavation of the project site. The Project Site is located in a highly developed portion of the City. Because the project area has already been previously disturbed, it has been subject to ground-disturbing activities. However, ground-disturbing activities have the potential to disturb previously undiscovered subsurface human remains. The Cultural Resources Evaluation Letter prepared by ASM Affiliates dated January 4, 2019 identifies no archaeological resources within the project area. While there are no known human remains on or near the project area and no formal cemeteries, other places of human interment, or burial grounds or sites are known to occur within the project area, there is always a possibility that human remains can be encountered during construction. In the event that human remains are unexpectedly uncovered during ground-disturbing activities, there are regulatory provisions to

[21] California Penal Code Section 622.5 sets the penalties for the damage or removal of identified paleontological resources.

address the handling of human remains in California Health and Safety Code Section 7050.5, Public Resource Code 5097.98, and CEQA Guidelines Section 15064.5I. Pursuant to these codes, in the event that human remain are discovered, it requires that disturbance of the site shall remain halted until the Los Angeles County Coroner (Coroner) has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The Coroner is required to make a determination within two working days of notification of the discovery of the human remains. If human remains of Native American origin are discovered during project construction, compliance with state laws, which fall within the jurisdiction of the Native American Heritage Commission (NAHC) (Public Resource Code Section 5097), relating to the disposition of Native American burials will be adhered to. If the Coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, he or she shall consult with the Native American Heritage Commission (NAHC) by telephone within 24 hours, to designate a Most Likely Descendant (MLD) who shall recommend appropriate measures to the landowner regarding the treatment of the remains. If the owner does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC. The Applicant shall bear the cost of implementing these measures. Compliance with these regulatory protocols would reduce impacts to a less than significant level. No further analysis of this topic is necessary.

6. GEOLOGY AND SOILS

This section is based on the information provided in the Geotechnical Soils Report prepared by Byer Geotechnical, Inc., dated February 10, 2017 (Soils Report). The Soils Report, including the Soils Report Approval Letter from the Department of Building and Safety Grading Division dated February 17, 2017, is incorporated herein by this reference, and provided in **Appendix H** to this Draft Initial Study.

In 2015, the California Supreme Court, in California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Ca[l.]4th 369 (CBIA v. BAAQMD), held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. On the other hand, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze that impact of that exacerbated condition on future residents and users of a project (as well as other impacted individuals). Thus, the analysis associated with existing geological hazards below focuses on whether the proposed project would exacerbate these environmental conditions so as to increase the potential to expose people to impacts.

Would the project:

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

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

Less Than Significant Impact. A significant impact would occur if the proposed project would cause personal injury or death or result in property damage as a result of a fault rupture occurring on the project site and if the project site is located within a State-designated Alquist-Priolo Zone or other designated fault zone. The Proposed Project would not directly expose people due to a rupture of a known earthquake fault. Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. The Proposed Project is located on a peninsula at the confluence of Ballona Creek and Centinela Creek. The California Geological Survey (CGS) designates Alquist-Priolo Earthquake Fault Zones, which are regulatory zones around active faults. According to the California Department of Conservation Special Studies Zone Map, the project site is not located within an Alquist-Priolo Special Studies Zone or Fault Rupture Study Area. The Project Site is not affected by, nor is located on, a state-designated Earthquake Fault

Zone.[22] The closest Alquist-Priolo Fault zone is located approximately 13 miles east of the Project Site. The Alquist-Priolo Earthquake Fault Zoning Act is intended to mitigate the hazard of surface fault rupture on structures for human occupancy. The closest geologic fault is the Charnock Fault, located approximately 0.9 mile east of the Project Site.[23]. The Site is also approximately 3.5 miles from the Newport - Inglewood Fault Zone. Therefore the potential for future surface rupture onsite is expected to be very low, and there would be a less than significant impact related to ground rupture. No further analysis is required.

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

Strong seismic ground shaking?

Less Than Significant Impact. A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with other locations in Southern California. The Project Site is located within seismically active Southern California and therefore could be subject to moderate and possibly strong ground motion due to its proximity to the Charnock Fault, Overland Avenue Fault, Newport – Inglewood – Rose Canyon Fault lines. Consequently, development of the proposed project could expose people and structures to strong seismic ground shaking. However, this impact will be reduced to a less than significant level by following all relevant California Building Code (CBC) and the City of Los Angeles Uniform Building Code (UBC) seismic standards; as well as the recommendations and the conditions required by the City of Los Angeles Department of Building and Safety (LADBS), to reduce the potential for exposure of people or structures to seismic risks to the maximum extent possible. The proposed project would be required to comply with the California Department of Conservation, Division of Mines and Geology (CDMG), which provides guidance for the evaluation and mitigation of earthquake-related hazards, and with the seismic safety requirements in the Uniform Building Code (UBC) and the LAMC. Compliance with such requirements would reduce seismic ground shaking impacts to the maximum extent practicable with current engineering practices.

Compliance with existing laws regarding the risk of loss, injury, or death, from strong seismic ground shaking would reduce potential impacts to less than significant levels. No further analysis is required.

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22 *Navigate Los Angeles, accessed 12/08/2016.*

23 *Navigate Los Angeles, accessed 12/08/2016.*

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

Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles CEQA Thresholds Guide, a significant impact may occur if a proposed project site is located within a liquefaction zone. Liquefaction is the loss of soil strength or stiffness due to a buildup of pore-water pressure during severe ground shaking. Soil liquefaction occurs when loose, saturated, granular soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Liquefaction potential is greatest where the groundwater level is shallow, and submerged loose, fine sands occur within a depth of approximately 50 feet or less.

The Project Site is susceptible to liquefaction and thus may be susceptible to seismic-related ground failure, such as lateral spreading, subsidence, or settlement.[24] However, specific Regulatory Compliance Measures in the City of Los Angeles regulate the grading and construction of projects in these particular types of locations and will reduce any potential impacts to less than significant. Regulatory Compliance Measures (RCMs) include the Uniform Building Code Chapter 18, Division 1, Section 1804.5: Liquefaction Potential and Soil Strength Loss. These RCMs have been historically proven to work to the satisfaction of the City Engineer to reduce any impacts from the specific environment the project is located.

Compliance with all relevant CBC and the City of Los Angeles UBC seismic standards, as well as the recommendations and the conditions as required by the LADBS would ensure that potential impacts would be reduced to less than significant levels. Furthermore, project construction will adhere to all current standards of practice as outline in the "Recommended Procedures for Implementation of DMG Special Publication 117, Guidelines for Analyzing and Mitigating Liquefaction in California" and "Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California," published by the California Department of Conservation. Furthermore, a Geotechnical Report was prepared by Byer Geotechnical, Inc. dated February 10, 2017, and submitted to the Department of Building and Safety for review. The Building and Safety, Grading Department issued a Soils Approval Letter dated February 17, 2017

24 *Navigate Los Angeles, accessed 12/08/2016.*

(Log Reference #96868) and their conditions are incorporated herein, by reference. Therefore, impacts related to seismic-related ground failure, including liquefaction, would be less than significant.

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

Landslides?

No Impact. A significant impact would occur if the proposed project would be implemented on a site that would be located in a hillside area with unstable geological conditions or soil types that would be susceptible to failure when saturated. Landslides are movements of large masses of rock and/or soil. Landslide potential is generally the greatest for areas with steep and/or high slopes, low sheer strength, and increased water pressure. The Project Site and surrounding areas are generally flat with gradual changes in elevation, and there are no major slopes or bluffs.

According to the California Department of Conservation, Division of Mines and Geology, the Seismic Hazard Zones Map for this area shows the project site is not located within a landslide hazard zone. As shown in the Parcel Profile Report prepared by the City of Los Angeles Department of City Planning[25], the Project Site is not located in an area susceptible to landslides. Further, the site is not located within a City-designated landslide area.[26] Therefore, the proposed project would not expose people or structures to potential effects resulting from landslides, and no impacts would occur.

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

Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. A significant impact would occur if construction activities or future uses would result in substantial soil erosion or loss of topsoil. Construction of the proposed project would result in ground surface disturbance during site clearance, excavation, and grading, which could create the potential for soil erosion to occur. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the vicinity of the project area include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used.

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25 *City of Los Angeles Department Of City Planning, Zoning/Property Info (ZIMAS), http://zimas.lacity.org/, accessed December 8, 2016.*

26 *City of Los Angeles General Plan, Safety Element, Exhibit C: Landslide Inventory and Hillside Areas, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed December 7, 2016.*

The Project Site is located in a developed, industrial area of the City and is relatively level, with minimal rises or changes in elevation. As previously indicated, Ballona Creek and Centinela Creek are directly adjacent to the Project Site. The Proposed Project is a residential development with landscaped and hardscaped areas, and would not contain large amounts of exposed soil. Following the completion of construction of the Proposed Project, the potential for soil erosion or the loss of topsoil is expected to be extremely low.

Construction of the Proposed Project would involve soil disturbance activities including excavation to a depth of approximately 16 feet, and grading that would leave soil on the Project Site exposed. Common means of soil erosion include water, wind, and being tracked off-site by vehicles. These activities could result in soil erosion. However, the Proposed Project will be subject to local and state codes and requirements for erosion control and grading during construction, including, but not limited to, grading permits and haul route approval from the LADBS, which include requirements and standards designed to limit potential impacts to acceptable levels.

Construction activities would be performed in accordance with the requirements of the Los Angeles Building Code and the Los Angeles Regional Water Quality Control Board (LARWQCB) through the City's Stormwater Management Division. In addition, on-site grading and site preparation must comply with all applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code, which addresses grading, excavations, and fills, and conditions imposed by the City of Los Angeles Department of Building and Safety's Soils Report Approval Letter dated February 17, 2017 (Log Reference #96868). Further, the Proposed Project will be required to comply with standard regulations, including South Coast Air Quality Management District Rule 402, which will reduce construction erosion impacts. Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance off-site.

Additionally, the Construction General Permit (CGP) issued by the State Water Resources Control Board (SWRCB), effective July 1, 2010, regulates construction activities to minimize water pollution, including sediment. The Proposed Project will be subject to National Pollution Discharge Elimination System permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would require implementation of an erosion control plan to reduce the potential for wind or waterborne erosion during the construction process. Construction contractors will be required to prepare and implement a SWPPP and associated best management practices (BMPs) in compliance with the CGP, along with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities during grading and construction. Adherence to the BMPs in the SWPPP

would reduce, prevent, or minimize soil erosion from project-related grading and construction activities.

Therefore, soil erosion impacts from grading and construction activities associated with construction and operation of the Proposed Project will not occur and soil erosion impacts will be less than significant. No further analysis is required.

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

Less Than Significant Impact. A significant impact would occur if any unstable geological conditions would result in any type of geological failure, including lateral spreading, off-site landslides, liquefaction, or collapse. Development of the proposed project may have the potential to expose people and structures to seismic-related ground failure, including liquefaction; see VI c-d for these issues. Subsidence and ground collapse generally occur in areas with active groundwater withdrawal or petroleum production. The extraction of groundwater or petroleum from sedimentary source rocks can cause the permanent collapse of the pore space previously occupied by the removed fluid. According to the Safety Element of the City of Los Angeles General Plan Safety Element of the Los Angeles City General Plan, Critical Facilities and Lifeline Systems, Exhibit E and/or the Environmental and Public Facilities Map (1996), the project site is not identified as being located in an oil field or within an oil drilling area. As previously discussed, the Proposed Project site is not in a landslide zone, but subject to liquefaction. The proposed project would be required to implement standard construction practices that would ensure that the integrity of the project site and the proposed structures is maintained. Construction will be required by the Department of Building and Safety to comply with the City of Los Angeles Uniform Building Code (UBC) which is designed to assure safe construction and includes building foundation requirements appropriate to site conditions. With the implementation of the Building Code requirements and the Department of Building and Safety's Soils Report Approval Letter dated February 17, 2017 (Log Reference #96868), the potential for landslide lateral spreading, subsidence, liquefaction or collapse would be less-than-significant. Compliance with current seismic safety standards would reduce liquefaction impacts to a less than significant level. Additionally, the Proposed Project will be designed and constructed in conformance with the CBC, as well as Los Angeles UBC requirements and other laws designed to protect site occupants from risks related to unstable soil. Compliance with existing laws regarding the risk of loss, injury, or death, from lateral spreading, subsidence, liquefaction or collapse would reduce potential impacts to less than significant levels. No further analysis is required.

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

Less Than Significant Impact. A significant impact would occur if the proposed project would be built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus, posing a hazard to life and property. Expansive soils have relatively high clay mineral and expand with the addition of water and shrink when dried, which can cause damage to overlying structures. However, the Proposed Project would be designed and constructed in conformance with the Los Angles UBC, and would be subject to the requirements of the CBC. Compliance with existing laws, the recommendations, and the conditions required by the LADBS in the Soils Report Approval Letter dated February 17, 2017 (Log Reference #96868) regarding expansive soils, would reduce potential impacts to less than significant levels. No further analysis is required.

h) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. A project would cause a significant impact if adequate wastewater disposal is not available. The Proposed Project would require connection to existing sewers mainlines and service lines, which are currently available in the surrounding roadways. The Proposed Project would not require the use of septic systems. Therefore, no impact would occur and no further analysis is required.

7. GREENHOUSE GAS EMISSIONS

Environmental Setting

The global nature of climate change creates unique challenges for assessing the project's climate change impact under CEQA, which focuses on cause and effect. When compared to the cumulative inventory of greenhouse gases (GHG) across the globe, a single project's impact will be negligible. To further complicate this, there is debate about whether a project's emissions are adding to the net emissions worldwide, or simply redistributing emissions that would have occurred anyway somewhere in the world.

Climate change analyses are also unique because emitting CO_2 into the atmosphere is not itself an adverse environmental effect. It is the increased concentration of CO_2 in the atmosphere resulting in global climate change and the associated consequences of climate change that results in adverse environmental affects (e.g., sea level rise, loss of snowpack, severe weather events). Although it is possible to estimate a project's incremental contribution of CO_2 into the atmosphere, it is typically not possible to determine whether or how an individual project's relatively small incremental contribution might translate into physical effects on the environment. Nevertheless, both short-term impacts occurring during construction and long-term effects related to the ongoing operation of the project are discussed in this section.

Pollutants and Effects

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

GHGs that contribute to the greenhouse effect include:

- **Carbon Dioxide** (CO_2) is released to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned. CO_2 emissions from motor vehicles occur during operation of vehicles and operation of air conditioning systems. CO_2 comprises over 80 percent of GHG emissions in California.[27]

[27] California Environmental Protection Agency, First Update to the Climate Change Scoping Plan, May 2014.

- **Methane** (CH_4) is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas and petroleum systems, stationary and mobile combustion, and wastewater treatment. Methane makes up 8.3 percent of all GHGs, and mobile sources and general fuel combustion represent 0.69 percent of overall methane emissions.[28]
- **Nitrous Oxide** (N_2O) is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels. Mobile sources represent about 12 percent of N_2O emissions.[29] N_2O emissions from motor vehicles generally occur directly from operation of vehicles.
- **Hydrofluorocarbons** (HFCs) are one of several high global warning potential (GWP) gases that are not naturally occurring and are generated from industrial processes. HFC (refrigerant) emissions from vehicle air conditioning systems occur due to leakage, losses during recharging, or release from scrapping vehicles at end of their useful life.
- **Perfluorocarbons** (PFCs) are another high GWP gas that are not naturally occurring and are generated in a variety of industrial processes. Emissions of PFCs are generally negligible from motor vehicles.
- **Sulfur Hexafluoride** (SF_6) is another high GWP gas that is not naturally occurring and is generated in a variety of industrial processes. Emissions of SF_6 are generally negligible from motor vehicles.

For most non-industrial development projects, motor vehicles make up the bulk of GHG emissions, particularly carbon dioxide, methane, nitrous oxide, and HFCs.[30] As illustrated in **Table IV-7**, **Global Warming Potential For Greenhouse Gases** the other GHGs are less abundant but have higher GWP than CO_2. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO_2, denoted as CO_2e. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted. High GWP gases such as HFCs, PFCs, and SF_6 are the most heat-absorbent.

28 Ibid.

29 United States Energy Information Administration, Emissions of Greenhouse Gases in the U.S., March 2011.

30 California Air Resources Board, Climate Change Emission Control Regulations, 2004

Table IV-7 Global Warming Potential For Greenhouse Gases	
Greenhouse Gas	**Global Warming Potential Factor (100-Year)**
Carbon Dioxide (CO_2)	1
Methane (CH_4)	25
Nitrous Oxide (N_2O)	298
Perfluorocarbons (PFCs)	7,390-12,200
Hydrofluorocarbons (HFCs)	124-14,800
Sulfur Hexafluoride (SF_6)	22,800

Source: Southern California Association of Governments, Draft Program EIR for 2016 RTP/SCS. November 24, 2015.
Note: Global warming potential measures how much heat a GHG traps in the atmosphere, in this case, over a 100-year period.

The effects of increasing global temperature are far-reaching and difficult to quantify. If the temperature of the ocean warms, it is anticipated that the winter snow season would be shortened. Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of supply for the state. According to a California Energy Commission report, the snowpack portion of the supply could potentially decline by 70 to 90 percent by the end of the 21st century. This phenomenon could lead to significant challenges securing an adequate water supply for a growing state population. Further, the increased ocean temperature could result in increased moisture flux into the state; however, since this would likely increasingly come in the form of rain rather than snow in the high elevations, increased precipitation could lead to increased potential and severity of flood events, placing more pressure on California's levee/flood control system. Sea level has risen approximately seven inches during the last century and is predicted to rise an additional 22 to 35 inches by 2100, depending on the future GHG emissions levels.[31] If this occurs, resultant effects could include increased coastal flooding, saltwater intrusion, and disruption of wetlands. As the existing climate throughout California changes over time, mass migration of species, or worse, failure of species to migrate in time to adapt to the perturbations in climate, could also result.

While efforts to reduce the rate of GHG emissions continue, the State has developed a strategy to adapt the State's infrastructure to the impacts of climate change. The 2009 California Climate Adaptation Strategy (Strategy) analyzes risks and vulnerabilities and proposes strategies to reduce risks. The Strategy begins what will be an ongoing process of adaptation, as directed by Governor Schwarzenegger's Executive Order S-13-08. The Strategy analyzes two components of

31 California Energy Commission, The Impacts of Sea Level Rise on the San Francisco Bay, July 2012.

climate change: (1) projecting the amount of climate change that may occur using computer-based global climate models and (2) assessing the natural or human systems' abilities to cope with and adapt to change by examining past experience with climate variability and extrapolating from this to understand how the systems may respond to the additional impact of climate change. The Strategy's key preliminary adaptation recommendations include:

- Appointment of a Climate Adaption Advisory Panel;
- Improved water management in anticipation of reduced water supplies, including a 20 percent reduction in per capita water use by 2020 from 2011 levels;
- Consideration of project alternatives that avoid significant new development in areas that cannot be adequately protected from flooding due to climate change;
- Preparation of agency-specific adaptation plans, guidance or criteria by September 2010;
- Consideration of climate change impacts for all significant State projects;
- Assessment of climate change impacts on emergency preparedness;
- Identification of key habitats and development of plans to minimize adverse effects from climate change;
- Development of guidance by the California Department of Public Health by September 2010 for use by local health departments to assess adaptation strategies;
- Amendment of General Plans and Local Coastal Plans to address climate change impacts and to develop local risk reduction strategies; and
- Inclusion of climate change impact information into fire program planning by State firefighting agencies.

Regulatory Setting

International

Kyoto Protocol

In 1988, the United Nations established the Intergovernmental Panel on Climate Change to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States (the "U.S.") joined other countries around the world in signing the United Nations' Framework Convention on Climate Change (UNFCCC) agreement with the goal of controlling greenhouse gas emissions. As a result, the

Climate Change Action Plan was developed to address the reduction of GHG emissions in the U.S. The plan currently consists of more than 50 voluntary programs for member nations to adopt.

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

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

On December 12, 2015, a Conference of the Parties to the UNFCCC and the 11th session of the Kyoto Protocol negotiated an agreement in Paris that would keep the rise of temperature below 2 degrees Celsius. While 186 countries published their action plans detailing how they plan to reduce their GHG emissions, these reductions would still result in up to 3 degrees Celsius of global warming. The Paris agreement asks all countries to review their plans every five years from 2020, acknowledges that $100 billion is needed each year to enable countries to adapt to climate change. The agreement was signed into law on April 22, 2016.

<u>The Western Regional Climate Action Initiative (WCI)</u>

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

other states and provinces to design a regional GHG reduction program that includes a cap-and-trade approach. The ARB's planned cap and-trade program, discussed below, is also intended to link California and the other member states and provinces.

Federal

The USEPA has historically not regulated GHG emissions because it determined the Clean Air Act did not authorize it to regulate emissions that addressed climate change. In 2007, the U.S Supreme Court found that GHG emissions could be considered within the Clean Air Act's definition of a pollutant.[32] In December 2009, USEPA issued an endangerment finding for GHG emissions under the Clean Air Act, setting the stage for future regulation. In September 2009, the National Highway Traffic Safety Administration (NHTSA) and USEPA announced a joint rule that would tie fuel economy to GHG emission reduction requirements. By 2016, this could equate to an overall light-duty vehicle fleet average fuel economy of 35.5 miles per gallon.

In June 2013, President Obama announced a Climate Action Plan that calls for a number of initiatives, including funding $8 billion in advanced fossil energy efficiency projects, calls for federal agencies to develop new emission standards for power plants, invests in renewable energy sources, calling for adaptation programs, and leading international efforts to address climate change. There have been numerous executive actions, proposed and finalized agency regulations, investment strategies, budgets requests, and international bilateral agreements. This includes a final rule for the Clean Power Plan in August 2015, which will cut carbon emissions from existing power plants 32 percent below 2005 levels by 2030.

<u>Vehicle Standards</u>

Other regulations have been adopted to address vehicle standards including the USEPA and the NHTSA joint rulemaking for vehicle standards.

- On March 30, 2009, the NHTSA issued a final rule for model year 2011.[33]
- On May 7, 2010, the USEPA and the NHTSA issued a final rule regulating fuel efficiency and GHG emissions pollution from motor vehicles for cars and light-duty trucks for model years 2012–2016.[34]

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32 Massachusetts v. Environmental Protection Agency et al (127 S. Ct. 1438 [2007])

33 NHSTA. 2009. Average Fuel Economy Standards Passenger Cars and Light Trucks Model Year 2011, Final Rule. 75 Fed. Reg. 25324.

34 USEPA. 2010. Light Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, Final Rule. 75 Fed. Reg. 25324.

- On August 9, 2011, USEPA and NHTSA issued a Supplemental Notice of Intent announcing plans to propose stringent, coordinated federal GHG emissions and fuel economy standards for model year 2017-2025 light-duty vehicles.[35]
- NHSTA intends to set standards for model years 2022-2025 in a future rulemaking.[36]
- In addition to the regulations applicable to cars and light-duty trucks, on August 9, 2011, the USEPA and the NHTSA announced fuel economy and GHG emissions standards for medium- and heavy-duty trucks that applies to vehicles from model year 2014–2018.[37]
- Energy Independence and Security Act (the "EISA")
- Among other key measures, the EISA would do the following, which would aid in the reduction of national GHG emissions, both mobile and non-mobile:
- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

While superseded by NHTSA and USEPA actions described above, EISA also set miles per gallon targets for cars and light trucks and directed the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.

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

State

Assembly Bill 1493

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35 Available http://www.gpo.gov/fdsys/pkg/FR-2011-08-09/pdf/2011-19905.pdf. Accessed July 2016.

36 NHSTA. 2012. 2017 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions and Corporate Average Fuel Economy Standards. 77 Fed. Reg. 62624.

37 USEPA Office of Transportation and Air Quality. 2011. EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium-and Heavy-Duty Vehicles. Available: http://www.epa.gov/otaq/climate/documents/420f11031.pdf. Accessed N.

California has adopted a series of laws and programs to reduce emissions of GHGs into the atmosphere. Assembly Bill (AB) 1493 by then-Assemblymember Fran Pavley was enacted in September 2003 and requires regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by vehicles used for personal transportation.

Executive Order S-3-05

On June 1, 2005, Governor Schwarzenegger issued Executive Order S-3-05, which set the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. The California Environmental Protection Agency (Cal EPA) formed a Climate Action Team ("CAT") that recommended strategies that can be implemented by state agencies to meet GHG emissions targets. The Team reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in the Executive Order.[38] Furthermore, the report provided to Governor Schwarzenegger in 2006 indicated that smart land use and increased transit availability should be a priority in the State of California.[39] According to the California Climate Action Team, smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population.

Executive Order B-30-15

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

A recent study shows that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030 (consistent with Executive Order B-30-15), and to 60 percent below 1990 levels by 2050. Even though this study

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38 California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006.

39 California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 57.

did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, it demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the study could allow the State to meet the 2030 and 2050 targets.[40]

Assembly Bill 32

In September 2006, AB 32 was signed into law by Governor Arnold Schwarzenegger, focusing on achieving GHG emissions equivalent to statewide levels in 1990 by 2020. It mandates that ARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved.

AB 32 charges ARB with the responsibility to monitor and regulate sources of GHG emissions. On June 1, 2007, ARB adopted three early action measures: setting a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance, and increasing methane capture from landfills.[41] On October 25, 2007, ARB approved measures improving truck efficiency (i.e., reducing aerodynamic drag), electrifying port equipment, reducing PFCs from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing sulfur hexafluoride emissions from the non-electricity sector. ARB also developed a mandatory reporting program on January 1, 2008 for large stationary combustion sources that emit more than 25,000 metric tons of CO_2 per year and make up 94 percent of the point source CO_2 emissions in California.

ARB developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap. This Scoping Plan, which was developed by ARB in coordination with the CAT, was first published in October 2008 (the "2008 Scoping Plan"). The 2008 Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the state's dependence on oil, diversify the state's energy sources, save energy, create new jobs, and enhance public health. It accommodated the State's projected population growth. Moreover, it expressly encouraged called for coordinated planning of growth, including the location of dense residential projects near transportation infrastructure, including public transit.

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40 Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158-172).

41 California Air Resources Board, Proposed Early Action Measures to Mitigate Climate Change in California, April 20, 2007.

An important component of the plan is a cap-and-trade program covering 85 percent of the state's emissions. Additional key recommendations of the 2008 Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California's clean cars standards and increasing the amount of clean and renewable energy used to power the state. Furthermore, the 2008 Scoping Plan proposes full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in California ports. As required by AB 32, ARB must update its Scoping Plan every five years to ensure that California remains on the path toward a low carbon future.

In order to assess the scope of reductions needed to return to 1990 emissions levels, ARB first estimated the 2020 "business-as-usual" (BAU) GHG emissions in the 2008 Scoping Plan. These are the GHG emissions that would be expected to result if there were no GHG emissions reduction measures, and as if the state were to proceed on its pre-AB 32 GHG emissions track. After estimating that statewide 2020 BAU GHG emissions would be 596 metric tons, the 2008 Scoping Plan then identified recommended GHG emissions reduction measures that would reduce BAU GHG emissions by approximately 174 metric tons (an approximately 28.4 percent reduction) by 2020.

On August 19, 2011, following legal action in opposition to the Scoping Plan, ARB approved a Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED or 2011 Scoping Plan).[42] ARB updated their 2020 BAU emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions achieved through implementation of regulations recently adopted for motor vehicles, building energy efficiency standards, and renewable energy.[43] Under that scenario, the State would have had to reduce its BAU GHG emissions by approximately 21.7 percent by 2020 (down from 28.4 percent).

On May 22, 2014, ARB approved its first update to the AB 32 Scoping Plan, recalculating 1990 GHG emissions using IPCC Fourth Assessment Report (AR4) released in 2007. It states that based on the AR4 global warming potentials, the 427 $MMTCO_2e$ 1990 emissions level would be slightly higher than identified in the original Scoping Plan, at 431 $MMTCO_2e$. Based on the revised estimates of expected 2020 emissions identified in the 2011 supplement to the FED and updated 1990 emissions levels identified in the draft first update to the Scoping Plan, achieving the 1990

42 California Air Resources Board, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, August 19, 2011.

43 California Air Resources Board, Greenhouse Gas Inventory – 2020 Emissions Forecast, http://www.arb.ca.gov/cc/inventory/data/forecast.htm, accessed July 2016.

emission level would require a reduction of 76 MMTCO_2e or a reduction by approximately 15.3 percent (down from 28.4 percent) to achieve in 2020 emissions levels in the BAU condition. ARB's First Update "lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," and many of the emission reduction strategies recommended by ARB would serve to reduce the project's post-2020 emissions level to the extent applicable by law by focusing on reductions from several sectors. [44,45]

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

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

Sector	Million Metric Tons of CO_2e Reduction	% of Statewide CO_2e Inventory	Summary of Recommended Actions
Energy	-25	-4.9 %	Reduce State's electric and energy utility emissions, reduce emissions from large industrial facilities, control fugitive emissions from oil and gas production, reduce leaks from industrial facilities
Transportation	-23	-4.5 %	Phase 2 heavy-duty truck GHG standards, ZEV action plan for trucks, construct High Speed rail system from SF to LA, coordinated land use planning, Sustainable Freight Strategy
High Global Warming Potential	-5	-1.0 %	Reduce use of high-GWP compounds from refrigeration, air conditioning, aerosols
Waste	-2	-0.4 %	Eliminate disposal of organic materials at landfills, in-State infrastructure development, address challenges with composting and anaerobic digestion, additional methane control and landfills
Cap and Trade Reductions	-23	-4.5 %	Statewide program that reduces emissions from regulated entities through performance-based targets

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

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

45 CARB, First Update, Table 6: Summary of Recommended Actions by Sector, pp. 94-99, May 2014.

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

Cap-and-Trade Program

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

Under the Cap-and-Trade Program, covered entities that emit more than 25,000 metric tons CO_2e per year must comply with the Cap-and-Trade Program. Triggering of the 25,000 metric tons CO_2e per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or "MRR"). ARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits.

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

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

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

While the 2020 cap would remain in effect post-2020,[46] the Cap-and-Trade Program is not currently scheduled to extend beyond 2020 in terms of additional GHG emissions reductions.[47] However, ARB has expressed its intention to extend the Cap-and-Trade Program beyond 2020 in conjunction with setting a mid-term target. The "recommended action" in the First Update for the Cap-and-Trade Program is: "Develop a plan for a post-2020 Cap-and-Trade Program, including cost containment, to provide market certainty and address a mid-term emissions target."[48] The "expected completion date" for this recommended action is 2017.[49] It is therefore reasonable to assume that the Cap-and-Trade Program will extend beyond 2020.

Senate Bill 1368

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

SB 97 & CEQA Guidelines

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

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46 California Health & Safety Code § 38551(a) ("The statewide greenhouse gas emissions limit shall remain in effect unless otherwise amended or repealed.")

47 See AB 1288 (Atkins, introduced 2015) that would eliminate the December 31, 2020, limit on the Cap-and-Trade Program.

48 CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, at 98 (May 2014).

49 Ibid.

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

State Bill 375

On September 30, 2008, SB 375 was instituted to help achieve AB 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for ARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations ("MPOs") to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. While SB 375 does not prevent ARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.[50]

On October 24, 2008, ARB published draft guidance for setting interim GHG emissions significance thresholds. This was the first step toward developing the recommended statewide interim thresholds of significance for GHG emissions that may be adopted by local agencies for

50 American Planning Association, California Chapter, Analysis of SB 375, http://www.calapa.org/-en/cms/?2841, accessed July 2016.

their own use. The guidance does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that are responsible for substantial GHG emissions (i.e., industrial, residential, and commercial projects). ARB's preliminary proposal consisted of a quantitative threshold of 7,000 metric tons (MT) of CO_2e per year for operational emissions (excluding transportation), and performance standards for construction and transportation emissions. Further, ARB's proposal sets forth draft thresholds for industrial projects that have high operational stationary GHG emissions, such as manufacturing plants, or uses that utilize combustion engines.[51] There is currently no timetable for finalized thresholds.

On September 23, 2010, ARB adopted regional targets for the reduction of GHG emissions applying to the years 2020 and 2035.[52] For the area under the Southern California Association of Governments' (SCAG) jurisdiction—including the project area—ARB adopted Regional Targets for reduction of GHG emissions by 8 percent for 2020 and by 13 percent for 2035. On February 15, 2011, the ARB's Executive Officer approved the final targets.[53]

Title 24 Energy Efficiency Standards

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

California Green Building Standards

The California Green Building Standards Code, which is Part 11 of the California Code of Regulations (the "CCR"), is commonly referred to as the *CALGreen* Code. *CALGreen* was added to Title 24 to represent base standards for reducing water use, recycling construction waste, and reducing polluting materials in new buildings. In contrast, Title 24 focuses on promoting more energy-efficient buildings and considers the building envelope, heating and cooling, water heating, and lighting restrictions. The first edition of the *CALGreen* Code in 2008 contained only voluntary standards. The 2010 edition included mandatory requirements for state-regulated

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51 *California Air Resources Board, http://www.arb.ca.gov/cc/localgov/ceqa/meetings/102708/prelimdraftproposal102408.pdf*

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

53 California Air Resources Board, 2011. Executive Order No. G-11-024: Relating to Adoption of Regional Greenhouse Gas Emission Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375.

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

Regional

South Coast Air Quality Management District Recommendations for Significance Thresholds

The SCAQMD convened a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members included government agencies implementing CEQA and representatives from stakeholder groups that will provide input to the SCAQMD staff on developing GHG CEQA significance thresholds. On December 5, 2008, the SCAQMD Governing Board adopted interim GHG significance threshold for projects where the SCAQMD is lead agency. This threshold uses a tiered approach to determine a project's significance, with 10,000 metric tons of CO_2 equivalent ($MTCO_2e$) as a screening numerical threshold for stationary sources.

The SCAQMD has not adopted guidance for CEQA projects under other lead agencies. In September 2010, the Working Group released additional revisions that recommended a screening threshold of 3,500 $MTCO_2e$ for residential projects, 1,400 $MTCO_2e$ for commercial projects, and 3,000 $MTCO_2e$ for mixed use projects. Additionally, the Working Group identified project-level efficiency target of 4.8 $MTCO_2e$ per service population as a 2020 target and 3.0 $MTCO_2e$ per service population as a 2035 target. The recommended area wide or plan-level target for 2020 was 6.6 $MTCO_2e$ and the plan-level target for 2035 was 4.1 $MTCO_2e$. The SCAQMD has not established a timeline for formal consideration of these thresholds.[54] In the meantime, the project level thresholds are used as a non-binding guide.

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

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[54] SCAG, Final PEIR for the 2016-2040 RTP/SCS, Appendix G. Accessible at http://rtpscs, scag.ca.gov/Documents/peir/2012fPEIR_AppendixG_ExampleMeasures.pdf

SCAG Regional Transportation Plan/Sustainable Communities Strategy

On April 7, 2016, SCAG adopted its 2016-2040 Regional Transportation Plan Sustainable Communities Strategy (the "RTP/SCS") update, calling for a continuation of integrated planning for land use and transportation that will help achieve the State's goal of reducing per capita GHG emissions by eight percent by 2020 compared to 2005 levels, by 18 percent by 2035, and 21 percent by 2040. The Plan calls for public transportation improvements that will reduce GHG emissions per household by up to 30 percent, one percent reduction in GHG from having zero emission vehicles, neighborhood vehicles, and carsharing/ridesourcing make up two percent of the vehicle fleet by 2040.

The RTP/SCS also includes a number of mitigation measures designed to reduce the potential of development to conflict with AB 32 or any other plan designed to reduce GHG.[55] These mitigation measures are particularly important where streamlining mechanisms under SB 375 are utilized. Examples of GHG emissions reduction mitigation measures include the following:

- **MM-GHG-3(a)(4)**: SCAG shall work with utilities, sub-regions, and other stakeholders to promote accelerated penetration of zero- (and/or near zero) emission vehicles in the region, including developing a strategy for the deployment of public charging infrastructure.
- **MM-GHG-3(a)(5)**: SCAG shall in its capacity as a Clean Cities Coalition establish coordinated, creative public outreach activities, including publicizing the importance of reducing GHG emissions and steps community members may take to reduce their individual impacts.
- **MM-GHG-3(a)(6)**: SCAG shall in its capacity as a Clean Cities Coalition establish coordinated, creative public outreach activities, including publicizing the importance of reducing GHG emissions and steps community members may take to reduce their individual impacts.
- **MM-GHG-3(a)(6)**: SCAG shall work with local community groups and business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian and bicycle modes of transportation such as the "Go Human" Campaign.
- **MM-GHG-3(a)(7):** SCAG shall support and/or sponsor workshops on water conservation activities, such as selecting and planting drought tolerant, native plants in landscaping, and installing advanced irrigation systems.

55 Southern California Association of Governments, Final PEIR, 2016-2040 RTP/SCS, Chapter 3.8

- **MM-GHG-3(a)(8):** SCAG shall in coordination with local jurisdictions (as practicable) support and/or sponsor a periodic Climate Protection Summits or Fairs, to educate the public on current climate science, projected local impacts, and local efforts and opportunities to reduce GHG emissions, including exhibits of the latest technology and products for conservation and efficiency.
- **MM-GHG-3(a)(9):** Schools Programs: SCAG shall develop and implement a program in coordination with school districts to present information to students about climate change and ways to reduce GHG emissions, and will support school-based programs for GHG reduction, such as school-based trip reduction and the importance of recycling.
- **MM-GHG-3(a)(11):** SCAG shall encourage local jurisdictions to support the following transportation-related strategies to reduce emissions:
    - Support the planning and development of HQTAs, jobs and housing balance, transit oriented development, and infill development through transportation investments and other funding decisions.
    - Offer incentives such as free or low-cost monthly transit passes to employees or free ride areas to residents and customers
    - Coordinate the funding of low carbon transportation with smart growth development.
    - Promote parking management measures that encourage walking and transit use in smart growth areas.
    - Develop comprehensive parking policies that encourages the use of alternative transportation
    - Incorporate bicycle lanes, routes and facilities into street systems, new subdivisions, and large developments, and create transit, bicycle, and pedestrian connections.
    - Require amenities for non-motorized transportation, such as secure and convenient bicycle parking.
- **MM-GHG-3(a)(10):** As part of SCAG's Sustainability Program, SCAG shall assist local jurisdictions in developing Climate Action Plans (CAPs, also known as Plans for the Reduction of Greenhouse Gas Emissions), as appropriate and feasible.

  The SCAG RTP/SCS also identifies a number of recommended project-level mitigation measures in its EIR's Mitigation Measure **MM-GHG-3(b)**, including:

- Measures in an adopted plan or mitigation program for the reduction of emissions that are required as part of the Lead Agency's decision.
- Reduction in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.
- Off-site measures to mitigate a project's emissions.
- Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to:
    - Use energy and fuel efficient vehicles and equipment;
    - Deployment of zero- and/or near zero emission technologies;
    - Use lighting systems that are energy efficient, such as LED technology;
    - Use the minimum feasible amount of GHG-emitting construction materials that is feasible;
    - Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;
    - Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;
    - Incorporate design measures to reduce energy consumption and increase use of renewable energy;
    - Incorporate design measures to reduce water consumption;
    - Use lighter-colored pavement where feasible;
    - Recycle construction debris to maximum extent feasible;
    - Plant shade trees in or near construction projects where feasible; and
    - Solicit bids that include concepts listed above.
- Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to, transit-active transportation coordinated strategies, increased bicycle carrying capacity on transit and rail vehicles;

- Incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; providing adequate bicycle parking and planning for and building local bicycle projects that connect with the regional network;
- Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and
- Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs.
- Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;
- Land use siting and design measures that reduce GHG emissions, including:
    - Developing on infill and brownfields sites;
    - Building high density and mixed use developments near transit;
    - Retaining on-site mature trees and vegetation, and planting new canopy trees;
- Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and
- Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.

Local (City of Los Angeles).

<u>Green LA Plan</u>

In May 2007, the City released its Green LA Plan that sets a goal to reduce the generation of GHG emissions 35 percent below 1990 levels by 2030. Key strategies include increasing the generation of renewable energy, improving energy conservation and efficiency, and changing land use patterns to reduce dependence on autos. This Plan included goals for energy, water, transportation, land use, waste, port, airport, and related sources:

Energy

- Increase the generation of renewable energy;
- Encourage the use of mass transit;

- Develop sustainable construction guidelines;
- Increase City-wide energy efficiency; and
- Promote energy conservation.

Water

- Decrease per capita water use to reduce electricity demand associated with water pumping and treatment.

Transportation

- Power the City vehicle fleet with alternative fuels; and
- Promote alternative transportation (e.g., mass transit and rideshare).

Other Goals

- Create a more livable City through land use regulations;
- Increase recycling, reducing emissions generated by activity associated with the Port of Los Angeles and regional airports;
- Create more City parks, promoting the environmental economic sector; and
- Adapt planning and building policies to incorporate climate change policy.

ClimateLA Implementation Plan

To implement the Green LA Plan, the City published ClimateLA, which included a baseline GHG emissions inventory for the City, identified enforceable strategies, and provided a means to monitor and report on progress toward the 2030 goal of reducing GHG emissions by 35 percent from 1990 levels. To achieve these goals, the City developed goals, including the following:

- Green Building: The program includes a goal calling for Los Angeles to be a worldwide leader in green buildings. Action E6 calls for a comprehensive set of green building policies to guide and support private sector development.
- Energy: Increase the amount of renewable energy provided by the Los Angeles Department of Water and Power, present a comprehensive set of green building policies to guide and

support private sector development, reduce energy consumed by City facilities, utilize solar heating where applicable, and help citizens to use less energy.

- Waste: Reduce or recycle 70 percent of trash by 2015.
- Open Space and Greening: Create 35 new parks, revitalize the Los Angeles River to create open space opportunities, plant one million trees, identify opportunities to "daylight" streams, identifying promising locations for stormwater infiltration to recharge groundwater aquifers, and collaborate with schools to create more neighborhood parks.

Mobility 2035 Plan

On January 20, 2016, the City adopted its Mobility 2035 Plan, the Circulation Element of its General Plan. The Plan focuses on developing a multi-modal transportation system that can address the City's mobility needs through 2035. The Plan calls for strategies that advance five goals: 1) Safety First, 2) World Class Infrastructure, 3) Access for All Angelinos, 4) Collaboration, Communication, and Informed Choices, and 5) Clean Environments and Healthy Communities.

While the Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation and targeting GHG through a more sustainable transportation system. It includes a key strategy, Program No. D7, which calls for the development of GHG tracking program that would quantify reductions in GHG from reductions in vehicle miles traveled. As such, the Plan's call for integrated land use planning, clean fuel vehicles are consistent with State and regional plans calling for more compact growth in areas with transportation infrastructure.

Green Building Ordinance

The City adopted a Green Building Ordinance in April 2008 that calls for reduction of the use of natural resources for new development.[56] Larger projects must be certified at the Leadership in Energy and Environmental Design (LEED) certified level. LEED certification generally ensures that projects exceed Title 24 (2013) standards by at least 10 percent.[57] The City's ordinance affects the following types of development:[58]

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56 City of Los Angeles, Ordinance No. 179820, added to LAMC as Section 16.10 (Green Building Program).

57 U.S. Green Building Council. "Interpretation 10396" accessed at http://www.usgbc.org/leed-interpretations?keys=10396 February 26, 2015.

58 Projects that voluntarily commit to LEED certification at the Silver level or higher receive expedited processing from the City.

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

The City's Green Building Ordinance has several requirements that call for reductions in GHG emissions from reducing in energy use, water use, and solid waste generation from new non-residential and high-rise residential buildings, including:

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

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

Section 99.04.303.4. Wastewater Reduction. Each building shall reduce by 20 percent wastewater by one of the following methods:

1. The installation of water conserving fixtures (water closets, urinals)
2. Utilizing non-potable water systems (captured rainwater, graywater, and municipally treated wastewater) complying with the current edition of the Los Angeles Plumbing Code or other methods.

Section 99.04.304.2. Outdoor Potable Water. Building on sites with 1,000 square feet or more of cumulative landscaped areas shall have separate meters or submeters for indoor and outdoor potable water use.

Section 99.04.304.3. Irrigation Design. Buildings on sites with 1,000 square feet or more of cumulative irrigated landscaped areas shall have irrigation controllers and sensors which include the following criteria and the manufacturer's recommendations.

Section 99.05.407.1. Weather Protection. Provide a weather-resistant exterior wall and foundation envelope as required by the Los Angeles Building Code section 1403.2 (Weather Protection) and California Energy Code Section 150, manufacturer's installation instructions, or local ordinance, whichever is more stringent.

Section 99.05.408. Construction Waste Reduction, Disposal and Recycling. Construction Waste Reduction of at Least 50 percent. Comply with Section 66.32 et seq. of the LAMC.

Section 99.05.408.4. Excavated Soil and Land Clearing Debris. 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project and when approved by the Department, such material may be stockpiled on site until the storage site is developed.

Section 99.05.410.1. Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals.

Section 99.05.504.3. Covering of Duct Openings and Protection of Mechanical Equipment During Construction. At the time of rough installation, or during storage of the construction site and until final startup of the heating and cooling equipment, all duct and other related air distribution component openings shall be covered with tape, plastic, sheet metal or other methods acceptable to the Department to reduce the amount of dust or debris which may collect in the system.

Section 99.05.504.4.6. Resilient Flooring Systems. For 50 percent of floor area receiving resilient flooring, install resilient flooring complying with the VOC-emission limits defined in the 2009 Collaborative for High Performance Schools criteria and listed on its Low-emitting Materials List or certified under the Resilient Floor Covering Institute FloorScore program.

Would the project:

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

Less than Significant Impact. Greenhouse gases (GHG) are those gaseous constituents of the atmosphere, both natural and human generated, that absorb and emit radiation at specific wavelengths within the spectrum of terrestrial radiation emitted by the earth's surface, the atmosphere itself, and by clouds. Construction and operation (i.e., use of the new building by occupants and mobile emissions associated with such use) of the Proposed Project would generate greenhouse gas emissions. Generally, the evaluation of an impact under CEQA requires measuring data from a project against a "threshold of significance."[59] Furthermore, "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."[60] For greenhouse gas emissions and global warming, there is not, at this time, one established, universally agreed-upon "threshold of significance" by which to measure an impact.

Existing Emissions

The existing project is used for temporary storage of several shipping containers. Accessing the shipping containers does not represent a significant amount of vehicle trips, and in order to perform a conservative analysis, was not included as a reduction in the total emissions associated with the Proposed Project.

Methodology

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

59 CEQA Guidelines Section 15064.7.

60 CEQA Guidelines Section 15064.7(c).

The California Climate Action Registry (Climate Registry) General Reporting Protocol provides basic procedures and guidelines for calculating and reporting GHG emissions from a number of general and industry-specific activities.[61] The General Reporting Protocol is based on the "Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard" developed by the World Business Council for Sustainable Development and the World Resources Institute through "a multi-stakeholder effort to develop a standardized approach to the voluntary reporting of GHG emissions."[62] Although no numerical thresholds of significance have been developed, and no specific protocols are available for land use projects, the General Reporting Protocol provides a basic framework for calculating and reporting GHG emissions from the project. The information provided in this analysis is consistent with the General Reporting Protocol's reporting requirements.

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

Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).

Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.

Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy (e.g., energy used to convey, treat, and distribute water and wastewater).[63]

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

ARB recommends consideration of indirect emissions to provide a more complete picture of the GHG footprint of a facility. Annually reported indirect energy usage aids the conservation

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61 California Climate Action Registry, General Reporting Protocol Version 3.1, January 2009, www.sfenvironment.org/sites/default/files/fliers/files/ccar_grp_3-1_january2009_sfe-web.pdf, accessed July 2016.

62 Ibid.

63 Embodied energy is a scientific term that refers to the quantity of energy required to manufacture and supply to the point of use a product, material, or service.

awareness of a facility and provides information to ARB to be considered for future strategies.[64] For example, ARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, the Office of Planning and Research has noted that lead agencies "should make a good-faith effort, based on available information, to calculate, model, or estimate… GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities."[65] Therefore, direct and indirect emissions have been calculated for the project.

GHG emissions were quantified from construction and operation of the project using SCAQMD's California Emissions Estimator Model (CalEEMod). Operational emissions include both direct and indirect sources including mobile sources, water use, solid waste, area sources, natural gas, and electricity use emissions. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.[66]

Significance Criteria

The SCAQMD is currently developing significance thresholds for greenhouse gas (GHG) emissions, but has published draft thresholds using a tiered approach. The draft approach as most recently updated in September 2010 is as follows:[67]

- Tier 1: Is the project exempt from further analysis under existing statutory or categorical exemptions? If yes, there is a presumption of less than significant impacts with respect to climate change.

- Tier 2: Is the project's GHG emissions within the GHG budgets in an approved regional plan? (The plan must be consistent with *State CEQA Guidelines* §§15064(h)(3), 15125(d), or 15152(s).) If yes, there is a presumption of less than significant impacts with respect to climate change.

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

65 OPR Technical Advisory, p. 5.

66 See www.caleemod.com.

67 South Coast Air Quality Management District, "Greenhouse Gases (GHG) CEQA Significance Thresholds Working Group Meeting #6," http://www.aqmd.gov/ceqa/handbook/GHG/2008/oct22mtg/oct22.html. 2008.

- Tier 3: Is the project's incremental increase in GHG emissions below or mitigated to less than the significance screening level (10,000 metric tons of carbon dioxide equivalent [$MTCO_2e$] per year for industrial projects; 3,500 $MTCO_2e$ for residential projects; 1,400 $MTCO_2e$ for commercial projects; 3,000 $MTCO_2e$ for mixed-use or all land use projects)? If yes, there is a presumption of less than significant impacts with respect to climate change.

- Tier 4: Does the project meet one of the following performance standards? If yes, there is a presumption of less than significant impacts with respect to climate change.

    - Option #1: Achieve some percentage reduction in GHG emissions from a base case scenario, including land use sector reductions from AB 32 (e.g., 29 percent reduction as recommended by the San Joaquin Valley Air Pollution Control District).

    - Option #2: For individual projects, achieve a project-level efficiency target of 4.8 $MTCO_2e$ per service population by 2020 or a target of 3.0 $MTCO_2e$ per service population by 2035. For plans, achieve a plan-level efficiency target of 6.6 $MTCO_2e$ per service population by 2020 or a target of 4.1 $MTCO_2e$ per service population by 2035.

- Tier 5: Does the project obtain offsets alone or in combination with the above to achieve the target significance screening level (offsets provided for 30-year project life, unless project life limited by permit, lease, or other legally binding conditions)? If yes, there is a presumption of less than significant impacts with respect to climate change. Otherwise, the project is significant.

As of July 2011, the SCAQMD has not announced when staff is expecting to present a finalized version of these thresholds to the Governing Board for consideration. The SCAQMD has adopted Rules 2700, 2701, and 2702 that address GHG reductions; however, these rules are currently applicable to boilers and process heaters, forestry, and manure management projects.

The Tier 3 thresholds are the most applicable to this project. Tier 3 requires that a project's incremental increase in GHG emissions should be below or mitigated to less than the significance screening level. Proposed projects that do not exceed the thresholds would not be considered to have a significant impact on the attainment of air quality goals and would, therefore, be considered to be consistent with the current air quality plan.

The SCAQMD draft thresholds do not provide separate significance thresholds for GHG emissions from construction activities, but recommend including them with operational emissions as amortized emissions over a 30-year project life. Therefore, the amortized construction GHG

emissions are included in the project's overall operational emissions and compared to the residential threshold of 3,500 $MTCO_2e$ per year.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.[68]

Executive Orders S-3-05 and B-30-15, SB 375, SCAG's Sustainable Communities Strategy, and the City of Los Angeles Green Building Ordinance all apply to the project and area all intended to reduce GHG emissions to meet the statewide targets set in AB 32.

Thus, the project would not have a significant effect on the environment if it is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions:

- Executive Orders S-3-05 and B-30-15;
- AB 32 Scoping Plan
- SCAG's Sustainable Communities Strategy; and
- Appropriate transportation and air quality plans from the City of Los Angeles, including the Green Building Ordinance, ClimateLA implementation Plan, and Mobility 2035 Plan.

Construction and Operation Impacts on Climate Change

Construction emissions were estimated using CalEEMod according to the same methodology as described above in **Section 3, Air Quality.** The SCAQMD recommends that construction GHG emissions be amortized over a 30-year project lifetime and included in the long-term operational GHG emissions. **Table IV-9, Estimated Operational Greenhouse Gas Emissions,** shows a summary of total estimated GHG emissions from construction and operation of the Proposed Project and compares the total to the SCAQMD significance thresholds.

68 14 CCR § 15064(h)(3).

Table IV-9 Estimated Annual CO_2e Greenhouse Gas Emissions (Metric Tons per Year)	
Scenario and Source	**2020 Project Emissions**
Area Sources	4
Energy Sources	696
Mobile Sources	2,327
Waste Sources	55
Water Sources	193
Construction (Total)	43
Total Emissions	3,318
SCAQMD Threshold	**3,500**
Exceeds Threshold?	No

Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.

Source: Impact Sciences, 2017.

As shown in **Table IV-9**, the Proposed Project's operational emissions would not exceed the threshold of 3,500 MTCO2e for land use development projects. Consequently there are no significant impacts from GHG emissions attributable to the project. As a result of this and the analysis of net emissions, the project's contribution to global climate change is not "cumulatively considerable" and is considered less than significant. No further analysis is required.

Furthermore, as discussed above, the City has adopted the Green LA Plan to provide a citywide plan for achieving the City's GHG emissions targets, for both existing and future generation of GHG emissions. In order to implement the goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current Los Angeles Green Building Code (LAGBC) (Ordinance No. 181,480). The LAGBC requires projects to achieve a 20 percent reduction in potable water use and wastewater generation. Through required implementation of the LAGBC, the proposed project would not conflict with local and statewide goals and policies aimed at reducing the generation of GHGs. Therefore, the proposed project's generation of GHG emissions would not make a cumulatively considerable contribution to emissions and impacts would be less than significant.

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

Less Than Significant Impact. The Proposed Project would have a significant impact with respect to GHG emissions and global climate change if it would substantially conflict with the provisions of Section 15064.4(b) of the State CEQA Guidelines

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

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

Many of the emission reduction strategies recommended by ARB would serve to reduce the project's post-2020 emissions level to the extent applicable by law and help lay the foundation "…for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," as called for in ARB's First Update to the AB 32 Scoping Plan.[69,70]

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

Consistency with the AB 32 Scoping Plan

The AB 32 Scoping Plan provides the basis for policies that will reduce cumulative GHG emissions within California to 1990 levels by 2020. **Table IV-10**, **Project Consistency with AB 32 Scoping Plan Greenhouse Gas Emission Reduction Strategies** evaluates the Proposed Project's consistency with the AB 32 Scoping Plan to determine whether it will result in adverse cumulative impacts to global climate change. The Proposed Project does not conflict with the AB 32 Scoping Plan's focus on emission reductions from several key sectors:

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

70 CARB, First Update, Table 6: Summary of Recommended Actions by Sector, pp. 94-99, May 2014.

Energy Sector: Continued improvements in California's appliance and building energy efficiency programs and initiatives, such as the State's zero net energy building goals, would serve to reduce the project's emissions level.[71] Additionally, further additions to California's renewable resource portfolio would favorably influence the project's emissions level.[72]

Transportation Sector: Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce the project's emissions level.[73]

Water Sector: The project's emissions level will be reduced as a result of further desired enhancements to water conservation technologies.[74]

Waste Management Sector: Plans to further improve recycling, reuse and reduction of solid waste will beneficially reduce the project's emissions level.[75]

Table IV-10
Project Consistency with AB 32 Scoping Plan
Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
California Cap-and-Trade Program. Implement a broad-based California cap-and-trade program to provide a firm limit on emissions.	**Not Applicable.** The statewide program is not relevant to the Proposed Project.
California Light-Duty Vehicle Greenhouse Gas Standards. Implement adopted Pavley standards and planned second phase of the system. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	**Not Applicable.** The development of standards is not relevant to the Proposed Project.
Energy Efficiency. Maximize energy efficiency building and appliance standards and pursue additional efficiency efforts including new technologies, and new policy and mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	**No Conflict.** The project is designed to meet CALGreen building standards by including several measures designed to reduce energy consumption.

71 CARB, First Update, pp. 37-39, 85, May 2014.
72 CARB, First Update, pp. 40-41, May 2014.
73 CARB, First Update, pp. 55-56, May 2014.
74 CARB, First Update, p. 65, May 2014.
75 CARB, First Update, p. 69, May 2014.

Table IV-10 Project Consistency with AB 32 Scoping Plan Greenhouse Gas Emission Reduction Strategies	
Strategy	**Project Consistency**
Renewables Portfolio Standard. Achieve 33 percent renewable energy mix statewide.	**No Conflict.** The project will utilize energy from the Los Angeles Department of Water and Power, which has goals to diversify its portfolio of energy sources to increase the use of renewable energy.
Low-Carbon Fuel Standard. Develop and adopt the Low Carbon Fuel Standard.	**Not Applicable.** The statewide program is not relevant to the Proposed Project.
Regional Transportation-Related Greenhouse Gases. Develop regional greenhouse gas emissions reduction targets for passenger vehicles.	**Not Applicable.** The development of regional planning goals is not relevant to the Proposed Project. The project's location is near several bus routes.
Vehicle Efficiency Measures. Implement light-duty vehicle efficiency measures.	**Not Applicable.** State agencies are responsible for implementing efficiency measures.
Goods Movement. Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	**Not Applicable.** State agencies are responsible for implementing regulations and promoting efficiency in goods movement.
Million Solar Roofs Program. Install 3,000 MW of solar-electric capacity under California's existing solar programs.	**No Conflict.** The Proposed Project includes 15 percent of the total roof area set aside for future solar panels.
Medium/Heavy-Duty Vehicles. Adopt medium and heavy-duty vehicle efficiency measures.	**Not Applicable.** State agencies are responsible for implementing efficiency measures.
Industrial Emissions. Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission.	**Not Applicable.** This measure addresses industrial facilities.
High Speed Rail. Support implementation of a high speed rail system.	**Not Applicable.** This calls for the California High Speed Rail Authority and stakeholders to develop a statewide rail transportation system.
Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**No Conflict.** The project is designed to meet the City's Green Building Ordinance and CAL Green building standards and will include several measures designed to reduce energy consumption.
High Global Warming Potential Gases. Adopt measures to reduce high global warming potential gases.	**Not Applicable.** State agencies are responsible for implementing these measures.
Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting and other	**No Conflict.** The project is expected to have minimal impact on solid waste facilities.

Table IV-10 Project Consistency with AB 32 Scoping Plan Greenhouse Gas Emission Reduction Strategies	
Strategy	**Project Consistency**
beneficial uses of organic materials and mandate commercial recycling. Move toward zero waste.	
Sustainable Forests. Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	**Not Applicable.** Resource Agency departments are responsible for implementing this measure.
Water. Continue efficiency programs and use cleaner energy sources to move and treat water.	**No Conflict.** The project would use water-efficient landscaping.
Source: Impact Sciences, 2017.	

Based on this evaluation, this analysis finds the project would be consistent with all feasible and applicable strategies recommended in the AB 32 Scoping Plan.

Consistency with SCAG's 2016-2040 RTP/SCS

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

Table IV-11, **Project Consistency with SCAG 2016-2040 RTP/SCS** demonstrates the project's consistency with the Actions and Strategies set forth in the 2016-2040 RTP/SCS. The project would also be consistent with the applicable goals and principles set forth in the 2016-2040 RTP/SCS and the Compass Growth Vision Report. Therefore, the project would be consistent with the GHG reduction related actions and strategies contained in the 2016-2040 RTP/SCS.

Table IV-11 Project Consistency with SCAG 2016-2040 RTP/SCS		
Actions and Strategies	**Responsible Party(ies)**	**Consistency Analysis** [a]
Land Use Strategies		
Reflect the changing population and demands, including	Local jurisdictions	**Not Applicable.** The project would not include residences that would add to the supply of housing in metropolitan Los

Table IV-11 Project Consistency with SCAG 2016-2040 RTP/SCS		
Actions and Strategies	**Responsible Party(ies)**	**Consistency Analysis** /a/
combatting gentrification and displacement, by increasing housing supply at a variety of affordability levels.		Angeles County. However, the project would not hinder the region's pursuit of this policy.
Focus new growth around transit.	Local Jurisdictions	**No Conflict.** The Proposed Project is multi-family residential development on a vacant site that is adjacent to an urbanized neighborhood and served by bus transit, and would not conflict with the 2016 RTP/SCS focus on growing near transit facilities.
Plan for growth around livable corridors, including growth on the Livable Corridors network.	SCAG Local Jurisdictions	**No Conflict.** The Proposed Project is multi-family residential development on a vacant site that is adjacent to an urbanized neighborhood and served by bus transit, and would not conflict with the 2016 RTP/SCS.
Support local sustainability planning, including developing sustainable planning and design policies, sustainable zoning codes, and Climate Action Plans.	Local Jurisdictions	**Not Applicable.** While this strategy calls on local governments to adopt General Plan updates, zoning codes, and Climate Action Plans to further sustainable communities, the Proposed Project would not interfere with such policymaking and would be consistent with those policy objectives.
Protect natural and farm lands, including developing conservation strategies.	SCAG Local Jurisdictions	**No Conflict.** The Proposed Project is multi-family residential development on a vacant site that has previously been used for shipping containers. The site is adjacent to an urbanized neighborhood, and has not been used for farming or agricultural uses.
Transportation Strategies		
Preserve our existing transportation system.	SCAG County Transportation Commissions Local Jurisdictions	**Not Applicable.** While this strategy calls on investing in the maintenance of our existing transportation system, the Proposed Project would not interfere with such policymaking.
Manage congestion through programs like the Congestion Management Program, Transportation Demand Management, and Transportation Systems Management strategies.	County Transportation Commissions Local Jurisdictions	**No Conflict.** The Proposed Project is multi-family residential development on a vacant site adjacent to an urbanized neighborhood. The Project proposes a TDM&MP that includes a privately funded fixed route shuttle that would provide drop off and pick up service to nearby transit stations, entertainment and work centers.
Promote safety and security in the transportation system.	SCAG County Transportation Commissions Local Jurisdictions	**Not Applicable.** While this strategy aims to improve the safety of the transportation system and protect users from security threats, the Proposed Project would not interfere with such policymaking.
Complete our transit, passenger rail, active transportation, highways and arterials, regional	SCAG	**Not Applicable.** This strategy calls for transportation planning partners to implement major capital and operational projects that are designed to address regional

Table IV-11 Project Consistency with SCAG 2016-2040 RTP/SCS		
Actions and Strategies	**Responsible Party(ies)**	**Consistency Analysis** [a]
express lanes, goods movement, and airport ground transportation systems.	County Transportation Commissions Local Jurisdictions	growth. The Proposed Project would not interfere with this larger goal of investing in the transportation system.
Technological Innovation and 21st Century Transportation		
Promote zero-emissions vehicles.	SCAG Local Jurisdictions	**No Conflict.** While this action/strategy is not necessarily applicable on a project-specific basis, the project would include electric vehicle charging infrastructure.
Promote neighborhood electric vehicles.	SCAG Local Jurisdictions	**No Conflict.** While this action/strategy is not necessarily applicable on a project-specific basis, the project would include electric vehicle charging infrastructure.

Source: Southern California Association of Governments; 2016–2040 RTP/SCS, Chapter 5: The Road to Greater Mobility and Sustainable Growth; April 2016 and Impact Sciences, 2017.

Consistency with the City of Los Angeles ClimateLA Implementation Plan

Construction of the Proposed Project would generally be consistent with ClimateLA implementation plan, including its goal of making Los Angeles a worldwide leader in green buildings. Specifically, compliance with the City's LEED-based requirements will produce energy savings for construction projects that is envisioned in the implementation of Action E6 (Present a comprehensive set of green building policies to guide and support private sector development). Therefore, the Proposed Project would result in a less-than-significant impact related to construction GHG emissions.

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

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

With regard to transportation, the project is consistent with the Plan's focus on reducing emissions from private vehicle use. Specifically, the site's location adjacent to an urbanized area with access to public transit, pedestrian, and bicycle facilities results in a transit-oriented

development that will reduce auto dependence.

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

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

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

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

Consistency with the City of Los Angeles Green Building Ordinance

The Los Angeles Green Building Ordinance requires that all projects filed on or after January 1, 2014 comply with the Los Angeles Green Building Code as amended to comply with the 2013 CALGreen Code. Mandatory measures under the Green Building Ordinance that would help

reduce GHG emissions include short and long term bicycle parking measures; designated parking measures; and electric vehicle supply wiring. The project would comply with these mandatory measures, as the project would provide on-site bicycle parking spaces. Furthermore, the Green Building Ordinance includes measures that would increase energy efficiency on the project Site, including installing Energy Star rated appliances and installation of water-conserving fixtures, including demand (tankless or instantaneous) water heater systems, where applicable. Therefore, the project is consistent with the Los Angeles Green Building Ordinance.

The Proposed Project will comply with the City of Los Angeles' Green Building Ordinance standards that compel LEED certification, reduce emissions beyond a NAT scenario, and are consistent with the AB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the State's codes. Under the City's Los Angeles Green Building Code, the project must incorporate several measures and design elements that reduce the carbon footprint of the development:

The Proposed Project would include design, construction, maintenance, and operation at the Leadership in Energy & Environmental Design (LEED) certified level. Projects that are LEED certified generally exceed Title 24 (2013) standards by at least 10 percent.[76] As such, it would incorporate several design elements and programs that will reduce the carbon footprint of the development, including:

1. **GHG Emissions Associated with Planning and Design.** The project must have measures to reduce storm water pollution, provide designated parking for bicycles and low-emission vehicles, have wiring for electric vehicles, reduce light pollution, and design grading and paving to keep surface water from entering buildings. These measures would include:

    - Design features to maximize the capture and reuse of storm water during construction and operations.
    - Inclusion of bicycle parking facilities on-site.
    - Inclusion of electric conduits that provide the opportunity for electric vehicle charging facilities any time in the future.
    - Implementation of best practices for managing storm water drainage and retention during construction (Green Building ordinance Section 99.04.106.2)

76 U.S. Green Building Council. "Interpretation 10396" accessed at http://www.usgbc.org/leed-interpretations?keys=10396 February 26, 2015.

- Access to several public transportation lines. (Los Angeles County Metropolitan Transportation Authority operates several routes on La Cienega Boulevard and nearby arterials.)
- Located near residential neighborhoods. The Project Site's proximity to medium- and high-density residential neighborhoods increases the likelihood that more travel to and from the development could be made by non-motorized modes that would reduce potential GHG emissions.

2. **GHG Emissions Associated with Energy Demand.** The project must meet Title 24 2013 standards and include Energy Star appliances, have pre-wiring for future solar facilities, and off-grid pre-wiring for future solar facilities. This includes:

- Use of low-emitting paints, adhesives, carpets, coating, and other materials.
- Equipment and fixtures will comply with the following where applicable:
    - All installed gas-fired space heating equipment will have an Annual Fuel Utilization Ratio of .90 or higher.
    - All installed electric heat pumps will have a Heating Seasonal Performance Factor of 8.0 or higher.
    - All installed cooling equipment will have a Seasonal Energy Efficiency Ratio higher than 13.0 and an Energy Efficiency Ratio of at least 11.5.
    - All installed tank type water heaters will have an Energy Factor higher than .6.
    - All installed tankless water heaters will have an Energy Factor higher than .80.
    - Perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow.
    - Building lighting in the kitchen and bathrooms will consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaires).
- An electrical conduit will be provided from the electrical service equipment to an accessible location in the attic or other location suitable for future connection to a solar system. The conduit shall be adequately sized by the designer but shall not be less than one inch. The conduit shall be labeled as per the Los Angeles Fire Department requirements. The electrical panel shall be sized to accommodate the installation of a future electrical solar system.

- A minimum of 250 square feet of contiguous unobstructed roof area will be provided for the installation of future photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.
- All appliances will meet ENERGY STAR if an ENERGY STAR designation is applicable for that appliance.

3. **GHG Emissions Associated with Water Use.** The project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. Wastewater reduction measures must be included that help reduce outdoor potable water use. This would include:

   - A schedule of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the building by at least 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture and fitting as required by the California Building Standards Code. The 20 percent reduction in potable water use shall be demonstrated by one of the following methods:
     - Each plumbing fixture and fitting shall meet reduced flow rates specified on Table 4.303.2; or
     - A calculation demonstrating a 20 percent reduction in the building "water use" baseline will be provided.
   - When single shower fixtures are served by more than one showerhead, the combined flow rate of all the showerheads will not exceed specified flow rates.
   - When automatic irrigation system controllers for landscaping are provided and installed at the time of final inspection, the controllers shall comply with the following:
     - Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change;
     - Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor that connects or communicates with the controller(s).

4. **GHG Emissions Associated with Solid Waste Generation.** The project is subject to construction waste reduction of at least 50 percent. In addition, Project Site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source

reduction, recycling, and composting. The project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.

5. **GHG Emissions Associated with Environmental Quality.** The project must meet strict standards for any fireplaces and woodstoves, covering of duct openings and protection of mechanical equipment during constructions, and meet other requirements for reducing emissions from flooring systems, any CFC and halon use, and other project amenities. This would include:

   - Openings in the building envelope separating conditioned space from unconditioned space needed to accommodate gas, plumbing, electrical lines and other necessary penetrations must be sealed in compliance with the California Energy Code.
   - Provide flashing details on the building plans which comply with accepted industry standards or manufacturer's instructions around windows and doors, roof valley, and chimneys to roof intersections.

Consistency with the City of Los Angeles Mobility 2035 Plan

While the Mobility 2035 Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation and targeting GHG through a more sustainable transportation system. The Proposed Project does not conflict with these general objectives, including the most relevant strategy, Program No. D7, which calls for the development of GHG tracking program that would quantify reductions in GHG from reductions in vehicle miles traveled.

Taken together, these strategies encourage providing recreational, cultural, and a range of shopping, entertainment and services all within a relatively short distance; providing employment near current and planned transit stations and neighborhood commercial centers; and supporting alternative fueled and electric vehicles. As a result, the project would not conflict with applicable State, regional and local GHG reduction strategies. Given that the project would generate GHG emissions that are less than significant, and given that GHG emission impacts are cumulative in nature, the project's incremental contribution to cumulatively significant GHG emissions would be less than cumulatively considerable, and impacts would be less than significant.

Cumulative Impacts

The emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project

and many sources in the atmosphere that may result in global climate change. The consequences of that climate change can cause adverse environmental effects. A project's GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. The State has mandated a goal of reducing statewide emissions to 1990 levels by 2020, even though statewide population and commerce is predicted to continue to expand. In order to achieve this goal, ARB is in the process of establishing and implementing regulations to reduce statewide GHG emissions. At a minimum, most project-related emissions, such as energy, mobile, and construction, are source categories targeted for emission reductions by the Cap-and-Trade Program.

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

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

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

As part of SCAG's 2016-2040 RTP/SCS, a reduction in VMT within the region is a key component to achieve the 2020 and 2035 GHG emission reduction targets established by ARB. The project

results in significant VMT reduction in comparison to NAT and would be consistent with the RTP/SCS.

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

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

The project would not conflict with applicable land use policies of the City of Los Angeles and SCAG's RTP/SCS pertaining to air quality, including reducing GHG emissions.

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

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

The project would provide multi-family residential development proximate to a major transportation corridor (i.e., Jefferson Boulevard) and would not interfere with SCAG's ability to implement the regional strategies outlined in the 2016-2040 RTP/SCS. The proposed project,

therefore, would not conflict with statewide, regional and local goals and policies aimed at reducing GHG emissions and would result in a less-than-significant impact related to plans that target the reduction of GHG emissions. Project-specific and cumulative impacts related to the emission of greenhouse gases would be less than significant. No further analysis is necessary.

8. HAZARDS AND HAZARDOUS MATERIALS

As noted above, the California Supreme Court, in CBIA v. BAAQMD, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. On the other hand, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze that impact of that exacerbated condition on future residents and users of a project (as well as other impacted individuals). Thus, the analysis associated with existing hazardous conditions below focuses on whether the proposed project would exacerbate these environmental conditions so as to increase the potential to expose people to impacts.

Would the project:

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

Less Than Significant Impact. A significant impact would occur if the Proposed Project would create a significant hazard though the routine transfer, use, or disposal of hazardous materials. Construction of the Proposed Project would involve the use of those hazardous materials that are typically necessary for construction of residential development (i.e., paints, building materials, cleaners, fuel for construction equipment, etc.). Therefore, construction of the Proposed Project would involve routine transport, use, and disposal of these types of hazardous materials throughout the duration of construction activities. However, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities. For example, the Proposed Project would be required to implement standard best management practices (BMPs) set forth by the City and the Los Angeles Regional Water Quality Control Board (RWQCB) which would ensure that wastes generated during the construction process are disposed of properly. Therefore, the Proposed Project would not create a significant impact related to routine transport, use, or disposal of hazardous materials during construction and impacts would be less than significant.

The Proposed Project consists of the development of residential units, and a parking garage with landscaping. Operation of the Proposed Project may require a variety of products to be transported to and exist on site to be used for facility upkeep that could be considered hazardous if used inappropriately. Such materials include cleaning solvents used for janitorial purposes, materials used for landscaping, and materials used for maintenance. Examples of such materials could include but are not limited to cleaning solvents, pesticides and herbicides for landscaping, and painting supplies. No uses or activities are proposed that would result in the use or discharge of unregulated hazardous materials and/or substances, or create a public hazard through

transport, use, or disposal. As a residential development, the proposed project would not involve large quantities of hazardous materials that would require routine transport, use, or disposal. All potentially hazardous materials transported, stored, or used on site for daily upkeep would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Compliance with existing local, state, and federal regulations would ensure the transport, storage, and sale of these materials would not pose a significant hazard to the public or the environment. Project impacts related to this issue would be less than significant.

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

Less Than Significant Impact. A significant impact would occur if the proposed project created a significant hazard to the public or environment due to a reasonably foreseeable release of hazardous materials. As noted in the preceding section, compliance with federal, state, and local laws and regulations relating to transport, storage, disposal and sale of hazardous materials would minimize any potential for accidental release or upset of hazardous materials. The Project site is not a Hazardous Waste / Border Zone Property; however, it is within a Methane Hazard zone.[77] There are no existing structures on-site that would require demolition.

Construction of the Proposed Project would involve the use of potentially hazardous materials, including paints, cleaners, vehicle fuels, oils, and transmission fluids. But as stated prior, conformance with all applicable local, state, and federal regulations governing such activities would make foreseeable accidents highly unlikely. As the Project Site is currently vacant, there would be very minimal demolition involved and thus no exposure to asbestos containing materials and/or lead-based paints that are usually present in existing, older buildings. Accordingly, impacts would be less than significant.

Methane

Methane (CH_4) is a naturally occurring, odorless, colorless, and extremely flammable gas with a wide distribution in nature. It is the major constituent of natural gas that is used as a fuel, and is an important source of hydrogen and a wide variety of other organic compounds. It is often found in conjunction with petroleum deposits. No long-term health effects are known to occur from exposure to methane. However, at very high concentration, methane can act as an asphyxiate by

[77] *City of Los Angeles Department Of City Planning, Zoning/Property Info (ZIMAS), http://zimas.lacity.org/, accessed December 8, 2016.*

reducing the relative concentration of oxygen in the air that is inhaled (similar to carbon monoxide). The primary danger posed by methane build-up is the risk of fire or explosion.

Methane in the atmosphere has both natural and anthropogenic (i.e., caused by humans) sources. Its atmospheric concentration is less than carbon dioxide (CO_2) and its lifetime in the atmosphere is brief (10-12 years) when compared to other gases. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other anthropogenic sources include fossil-fuel combustion and biomass burning.

Methane has the potential to migrate into buildings through physical pathways that include cracks in concrete foundations, unsealed conduits or utility trenches, and other small openings common in building construction. Methane gas can also reach the surface through natural geologic features which may facilitate vertical, lateral or oblique migrations.

Worker exposure to methane is regulated by the federal Occupational Safety and Health Administration (OSHA) under CFR section 1910.146. This section regulates worker exposure to a 'hazardous atmosphere' within a confined space where the presence of flammable gas vapor or mist is in excess of 10 percent of the lower explosive limit.

Chapter IX, Article 1, Division 71, Section 91.7103 of the Los Angeles Municipal Code (LAMC), also known as the Los Angeles Methane Seepage Regulations, identifies Methane Hazard Zones and Methane Buffer Zones. The Project Site is located within a Methane Hazard Zone, as designated by Los Angeles Department of Building and Safety (LADBS). Due to the potential environmental risk associated with Methane Hazard Zones, properties within a Methane Hazard Zone require methane testing and mitigation upon (re)development.

In compliance with Division 71 of the Los Angeles Building Code the future structure will be required to have an LA City approved methane mitigation system.

As discussed in Section **8(a)**, no hazardous materials would be used, transported or disposed of in conjunction with the routine day-to-day operations of the Proposed Project. Thus, there would not be a significant hazard related to accidental release of hazardous materials into the environment once the Project is occupied.

With implementation of the following regulatory compliance measures, Project impacts associated with hazards and hazardous materials would be less than significant.

Regulatory Compliance Measures:

RCM-HAZ-1 As the Project site is within a methane zone, prior to the issuance of a building permit, the site shall be independently analyzed by a qualified engineer, as defined in Ordinance No. 175,790 and Section 91.7102 of the LAMC, hired by the Project Applicant. The engineer shall investigate and design a methane mitigation system in compliance with the LADBS Methane Mitigation Standards for the appropriate Site Design Level which will prevent or retard potential methane gas seepage into the buildings. The Applicant shall implement the engineer's design recommendations subject to DOGGR, LADBS and LAFD plan review and approval.

RCM-HAZ-2 During subsurface excavation activities, including borings, trenching and grading, OSHA worker safety measures shall be implemented as required to preclude any exposure of workers to unsafe levels of soil-gases, including, but not limited to, methane.

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

Less Than Significant Impact. Construction activities have the potential to result in the release, emission, handling, and disposal of hazardous materials within one-quarter mile of an existing school. Westside Neighborhood School, a private school located on 5401 Beethoven Street, is located approximately 0.15 mile south of the Project Site. Animo Westside Charter Middle School is located approximately 1,300 feet to the southeast of the Project Site. There are no other schools within 0.25 miles of the Project Site. Other schools in the area include Marina Del Rey Middle School, approximately 0.3 miles northeast of the Project Site, and Playa Del Rey Elementary School, approximately 0.75 miles east of the Project Site.

As previously discussed, construction of the Proposed Project would involve the use of those hazardous materials that are typically necessary for construction of residential development (i.e., paints, building materials, cleaners, fuel for construction equipment, etc.). Therefore, construction of the Proposed Project would involve routine transport, use, and disposal of these types of hazardous materials throughout the duration of construction activities. However, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities. For example, the Proposed Project would be required to implement standard BMPs set forth by the City and the RWQCB which would ensure that wastes generated during the construction process are disposed of properly.

The Proposed Project consists of the development of residential units, and a parking garage with landscaping. Operation of the Proposed Project may require a variety of products to be transported to and exist on site to be used for facility upkeep that could be considered hazardous if used inappropriately. Such materials include cleaning solvents used for janitorial purposes, materials used for landscaping, and materials used for maintenance. Examples of such materials could include but are not limited to cleaning solvents, pesticides and herbicides for landscaping, and painting supplies. All potentially hazardous materials transported, stored, or used on site for daily upkeep would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations.

As the Proposed Project will comply with all federal, state, and local standards and regulations, it is not anticipated to emit any hazardous emissions during construction or operation. Therefore, the Proposed Project is not expected to adversely affect Westside Neighborhood School, Marina Del Rey Middle School or Playa Del Rey Elementary School. Impacts would be less than significant.

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?

Less Than Significant Impact. California Government Code Section 65962.5 requires various State agencies, including but not limited to, the Department of Toxic Substances Control (DTSC) and the SWRCB, to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis.[78] A significant impact may occur if a Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

The California Department of Toxic Substances Control (DTSC) maintains a database (EnviroStor) that provides access to detailed information on hazardous waste permitted sites and corrective action facilities, as well as existing site cleanup information. EnviroStor also provides information on investigation, cleanup, permitting, and/or corrective actions that are planned, being conducted, or have been completed under DTSC's oversight. The Proposed Project is not located on a site that is included on a list of hazardous materials pursuant to Government Code

[78] *These lists include, but are not limited to, the 'EnviroStor' (http://www.envirostor.dtsc.ca.gov/public/) and 'GeoTracker' (http://geotracker.waterboards.ca.gov/) lists maintained by the DTSC and the SWRCB, respectively.*

65962.5, which is the Hazardous Waste and Substances (Cortese) List.[79] A review of the Cortese List compiled on the DTSC, State Water Board, EnviroStor[80] and CAL EPA showed that the site is not identified on any of these database lists. Therefore, the proposed project would not be located on a site that is included on a list of hazardous materials sites or create a significant hazard to the public or the environment, and impacts would be less than significant.

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

Less than significant impact. The Project Site is not located within an airport land use plan. Los Angeles International Airport is located approximately 2.0 miles south of the Project Site. However, because the project is not located within the LAX planning boundary, the LAX influence boundary, or the LAX noise contours, safety hazards for people residing in the project area would be less than significant. Therefore, the proposed project would not result in a safety hazard for people residing or working in the project area, and impacts would be less than significant.

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

No Impact. There are no recognized private airstrips in the proximity of the Project Site. Thus, there would be no safety hazards for people residing or working in the project area. No impacts would occur.

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

Less Than Significant Impact. The SR 90 Freeway, adjacent to the Project Site, Culver Boulevard, Centinela Avenue, Lincoln Boulevard, and Jefferson Boulevard are designated disaster routes in the General Plan Safety Element's Critical Facilities & Lifeline Systems Map (Exhibit H) that are proximate to the Project Site.[81] Disaster routes function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. The Safety Element emphasizes

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79 *https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=23834+highlander+road, accessed December 7, 2016*

80 Envirostor is the Department of Toxic Substances Control's data management system.

81 *City of Los Angeles City Planning Department, Environmental and Public Facilities Maps, Critical Facilities & Lifeline Systems in the City of Los Angeles, September 1996,(General Plan Safety Element, Exhibit H: Critical Facilities & Lifeline Systems, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf).*

immediate emergency debris clearance and road/bridge repairs for short-term emergency operations along these routes.

Although the Project Site is adjacent to a designated disaster route, neither the construction nor the operation of the Proposed Project would require or result in modifications to any of the roadways that would impact emergency traffic. Construction of the Proposed Project could temporarily interfere with local and on-site emergency response. However, construction traffic would conform to all traffic work plan and access standards to allow adequate emergency access. Implementation of a Construction Management Plan per RCM-AQ-1**,** and compliance with access standards would reduce the potential for the impacts on haul routes, emergency response and access during construction of the Proposed Project. The majority of construction activities for the Proposed Project would be confined to the site, except for infrastructure improvements, which may require some work in adjacent street rights-of-way. However, this work would be short-term and temporary, and would occur during off-peak periods.

New driveways would be provided to enter the Project Site, including a bridge that would span across Centinela Creek. However, the design of the Proposed Project would not cause a permanent alteration to the local vehicular circulations routes and patterns, or impede public access or travel on any public rights-of-way. In addition, the Applicant will submit a parking and driveway plan for review by the Los Angeles Fire Department (LAFD), the Bureau of Engineering (BOE) and the Los Angeles Department of Transportation (LADOT) to ensure compliance with all applicable code-required site access and circulation requirements, as well as code-required emergency access.

The proposed project would not require the closure of any public or private streets and would not impede emergency vehicle access to the project site or surrounding area. Therefore, demolition, construction and operation of the Proposed Project is not anticipated to significantly impair implementation of, or physically interfere with, any adopted or on-site emergency response or evacuation plans or a local, state, or federal agency's emergency evacuation plan, and the Proposed Project would have a less than significant impact with respect to these issues.

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?

No Impact. A significant impact would occur if the proposed project exposed people and structures to high risk of wildfire. The Project Site is located on a vacant site adjacent to an urbanized area that does not contain any wildlands or urbanized areas intermixed with

wildlands. The Project Site is not located within a City designated Fire Hazardous Area[82]. Accordingly, the project site and the surrounding area are not subject to wildland fires. Further, the project would incorporate all applicable provisions of the LAMC Fire Code, including, but not limited to, installation of an automatic sprinkler system, smoke detectors, and a fire alarm system. Therefore, the proposed project would not expose people or structures to a risk of loss, injury, or death involving wildland fires, and there would be no potential impacts from wildland fires.

[82] *City of Los Angeles, Department of Public Works, Bureau of Engineering, NavigateLA, http://navigatela.lacity.org/navigatela/, accessed December 08, 2016.*

9. HYDROLOGY AND WATER QUALITY

Would the project:

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

Less Than Significant Impact. A significant impact would occur if the proposed project discharges water that does not meet the quality standards of agencies which regulate surface water quality and water discharge into storm water drainage systems, or does not comply with all applicable regulations as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB).

As part of Section 402 of the Clean Water Act, the United States Environmental Protection Agency (USEPA) has established regulations under the National Pollution Discharge Elimination System (NPDES) program to control direct storm water discharges. In California, the SWRCB administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the RWQCB to preserve, protect, enhance, and restore water quality.

A project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the SWRCB. These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

As required under the NPDES, the Proposed Project would be responsible for the preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of BMPs to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. Implementation of SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards and discharge requirements, or otherwise substantially degrade water quality.

Stormwater runoff from the proposed project has the potential to introduce small amounts of pollutants into the stormwater system. Pollutants would be associated with runoff from landscaped areas (pesticides and fertilizers) and paved surfaces (ordinary household cleaners). During the operation, the Proposed Project would be required to comply with the City of Los Angeles's Low Impact Development (LID) Ordinance (No. 181,899) that was adopted by the Los Angeles Board of Public Works on July 1, 2011 and by the Los Angeles City Council on September 27, 2011; it became effective on May 12, 2012.

The LID Ordinance applies to all development and redevelopment in the City of Los Angeles that requires a building permit. The Ordinance requires the preparation of a LID Plan and a Standard Urban Stormwater Mitigation Plan (SUSMP) if necessary. The LID Ordinance requires projects to capture and treat the first ¾-inch of rainfall in accordance with established stormwater treatment priorities. Full compliance with the LID Plan, SUSMP, and implementation of design-related best management practices would ensure that the operation of the Proposed Project would not violate any water quality standards and discharge requirements or otherwise substantially degrade water quality. If required, any dewatering activities during construction shall comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032 National Pollutant Discharge Elimination System (NPDES) No. CAG994004) or subsequent permit. The Proposed Project does not include any point-source discharge (discharge of polluted water from a single point such as a sewage-outflow pipe).

Thus, the proposed project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) standards and the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the project site are minimized for downstream receiving waters. The ordinances contain requirements for construction activities and operation of projects to integrate low impact development practices and standards for stormwater pollution mitigation, and maximize open, green and pervious space on all projects consistent with the City's landscape ordinance and other related requirements in the City's Development Best Management Practices (BMPs) Handbook. Conformance would be ensured during the City's building plan review and approval process. Therefore, the proposed project would result in less-than-significant impacts. Therefore, the project would result in a less than significant impact to water quality and waste discharge during its construction and operation.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a

lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less Than Significant Impact. A significant impact would occur if the Proposed Project substantially depleted groundwater or interfered with groundwater recharge.

The Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City. Water is supplied to the City from three primary sources, including water supplied by the Metropolitan Water District (MWD) (53 percent; Bay Delta 45 percent, Colorado River 8 percent), snowmelt from the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct (34 percent), local groundwater (12 percent), and recycled water (1 percent).[83] Based on the City's most current Urban Water Management Plan (UWMP)[84], in 2011-2014 the LADWP has an average a water demand of 566,990 acre-feet[85] per year. Over the last five years, groundwater, largely from the San Fernando Basin (SFB) has provided approximately 12 percent of the total water supply for Los Angeles, and up to 23 percent of total supply during extended dry periods when imported supplies become less reliable. Groundwater levels in the City are maintained through an active process via spreading grounds and recharge basins found primarily in the San Fernando Valley.

The Project Site is currently vacant and within the Ballona Creek watershed and thus does not afford an opportunity for groundwater recharge activities to a basin used for water supply by the LADWP.[86] Following site redevelopment, groundwater recharge on the Project Site would continue to be negligible, similar to existing conditions.

Construction of the Proposed Project would involve excavation to approximately 16 feet below ground surface, and paving of the existing site. As such, the Proposed Project may extend into the existing groundwater table. The project would be required to comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. This will include submission of a Notice of Intent for coverage

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83 *Los Angeles Department of Water and Power - Water: Facts and Figures, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrl-state=18i8d8hpzl_21&_afrLoop=430938015435485 , access December 9, 2016.*

84 *Los Angeles Department of Water and Power, UWMP 2015.* file:///C:/Users/alee/Downloads/2015%20Urban%20Water%20Management%20Plan-LADWP%20(4).pdf*https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=OPLADWPCCB456809&RevisionSelectionMethod=LatestReleased, accessed December 7, 2016.*

85 *One acre foot equals 325,851 gallons of water.*

86 *The major tributaries to the Ballona Creek watershed include Centinela Creek, Sepulveda Canyon Channel, Benedict Canyon Channel, and numerous storm drains. Ballona Creek is designed to discharge stormwater to Santa Monica Bay, rather than act as a recharge basin.*

under the permit to the RWQCB at least 45 days prior to the start of dewatering and compliance with all applicable provisions in the permit, including water sampling, analysis, and reporting of dewatering-related discharges. Any groundwater extracted from the Project Site would need to be treated, if warranted, prior to being discharged into the sanitary sewer. Therefore, the Proposed Project's potential impacts relating to dewatering would be less than significant.

Impacts related to groundwater supplies would be less than significant, and no further analysis is necessary.

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, which would result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. A significant impact would occur if the Proposed Project substantially altered the drainage pattern of the site or an existing stream or river, so that substantial erosion or siltation would result on- or off-site.

The Project Site is on a vacant site adjacent to an urbanized area of the City of Los Angeles, on the confluence of Ballona and Centinela Creek. The Project Site is currently vacant and stormwater runoff sheet flows to the existing channels during a storm event. Project construction would temporarily expose on-site soils to surface water runoff.

However, compliance with construction-related BMPs and/or the Storm Water Pollution Prevention Plan (SWPPP) would control and minimize erosion and siltation. During project operation, storm water or any runoff irrigation waters would be directed into existing storm drains that are currently receiving surface water runoff under existing conditions. Significant alterations to existing drainage patterns within the project site and surrounding area would not occur. Therefore, the proposed project would result in less-than-significant impact related to the alteration of drainage patterns and on- or off-site erosion or siltation.

The project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction the Proposed Project. Further, the project would be required to implement an LID Plan (during the project's operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. Prior to the construction of the bridge over Centinela Creek, runoff from the site and any dewatering will be collected then be pumped to the existing stormdrain in Centinela Avenue. Once the bridge across Centinela Creek is constructed, a permanent pump station will be constructed with a force main attached to the upstream side of the bridge and continuing toward Beethoven Street and will empty into a 66-inch storm drain located in Beethoven Avenue.

The LID Ordinance applies to all development and redevelopment in the City of Los Angeles that requires a building permit. The Ordinance requires the preparation of a LID Plan and a Standard Urban Stormwater Mitigation Plan (SUSMP) if necessary. The LID Ordinance requires projects to capture and treat the first ¾-inch of rainfall in accordance with established stormwater treatment priorities. Best Management Practices (BMPs) will be implemented as per City requirements. At this time, a pretreatment device, such as a CDS unit, and large cisterns to capture and use rain water for irrigation are proposed as permanent BMPs. Full compliance with the LID Plan, SUSMP, and implementation of design-related best management practices would ensure that the operation of the Proposed Project would not violate any water quality standards or lead to substantial erosion or siltation.

Therefore, the project would result in a less than significant impact in relation to surface water hydrology and would not result in substantial erosion or siltation on- or off-site.

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 which would result in flooding on- or off-site?

Less Than Significant Impact. As discussed above under **Section 9(c)**, implementation of the Proposed Project is not anticipated to substantially change the drainage pattern on the Project Site. As discussed above, the project would implement both a SWPPP and an LID Plan and would not substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or –off-site. During project operation, storm water or any runoff irrigation waters would be directed into existing storm drains that are currently receiving surface water runoff under existing conditions. Impermeable surfaces resulting from the development of the project would not substantially change the volume of stormwater runoff in a manner that would result in flooding on- or off-site. Accordingly, significant alterations to existing drainage patterns within the site and surrounding area would not occur. Therefore, the proposed project would result in less-than-significant impacts related to the alteration of drainage patterns and on- or off-site flooding. As Ballona and Centinela Creek flank the Project Site, these requirements would be meticulously followed to prevent excessive surface runoff from the Project Site to these channels. As such, impacts would be less than significant.

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

Less Than Significant Impact. A project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or

nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the volume of storm water runoff from the Project Site were to increase to a level which exceeds the capacity of the storm drain system serving the Project Site. A project-related significant adverse effect would also occur if the project would substantially increase the probability that polluted runoff would reach the storm drain system.

Construction-Related Project Impacts

Three general sources of potential short-term construction-related stormwater pollution associated with the Proposed Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials may effectively mitigate the potential pollution of stormwater by these materials. These same types of common sense, "good housekeeping" procedures, or BMPs, can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze or other fluids on the construction site are also common sources of stormwater pollution and soil contamination.

Grading activities can greatly increase erosion processes. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. During construction, the Applicant shall be required to implement all applicable and mandatory BMPs in accordance with the approved LID Plan and the SWPPP. When properly designed and implemented, these "good-housekeeping" practices are expected to reduce short-term construction-related impacts to a less than significant level.

Operation-Related Project Impacts

Activities associated with operation of the Proposed Project would generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars in the parking garage could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. However, impacts to water quality would be reduced since the Proposed Project must comply with water quality standards

and wastewater discharge BMPs set forth by the City of Los Angeles, the SWRCB and the Proposed Project's approved LID Plan. Site-generated surface water runoff would continue to flow to the City's storm drain system. Any project that creates, adds, or replaces 500 square feet of impervious surface must comply with the Low impact Development (LID) Ordinance or alternatively, the City's Standard Urban Stormwater Mitigation Plan (SUSMP), as an LAMC requirement to address water runoff and storm water pollution. Therefore, the proposed project would result in less-than-significant impacts related to existing storm drain capacities or water quality. Compliance with existing regulations and the approved LID Plan would reduce the potential for the Proposed Project to exceed the capacity existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff impacts to a less than significant level. No further analysis is required.

f) Otherwise substantially degrade water quality?

Less Than Significant Impact. A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality.

Other than the sources discussed above, as described in Sections **9(a)** and **9(e)**, the project does not include other potential sources of contaminants which could potentially degrade water quality.

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

requirements and City grading regulations, project construction impacts related to water quality would be less than significant, and no further analysis of this issue is required.

During the project's operational phase, in accordance with the City's LID Ordinance, the Project Applicant would be required to incorporate appropriate stormwater pollution control measures into the design plans and submit these plans to the City's Department of Public Works, Bureau of Sanitation, Watershed Protection Division (WPD) for review and approval. Upon satisfaction that all stormwater requirements have been met, WPD staff would stamp the plan approved. Through compliance with the City's LID Ordinance, the project would meet the City's water quality standards. The project will comply with all federal, state and local regulations governing stormwater discharge. Therefore, project impacts related to operational water quality would be less than significant. No further analysis is required.

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?

Less Than Significant Impact. A significant impact would occur if the proposed project would be located within a 100-year or 500-year floodplain or would impede or redirect flood flows. The Federal Emergency Management Agency (FEMA) prepares and maintains Flood Insurance Rate Maps (FIRMs), which show the extent of Special Flood Hazard Areas (SFHAs) and other thematic features related to flood risk**.** The portion of the Project Site where the residential units would be built is in an area of minimal flood risk (Zone X) and is not located within a 100-year flood zone, as mapped by FEMA.[87] The perimeter bordering the proposed development site is classified as an area with 1 percent annual chance of flooding. However, as indicated on the Project Site plans, there would be a 10 feet perimeter, and a natural habitat preserve on the areas with flooding risk, therefore not exposing housing or structures to areas of flooding. Therefore, the Proposed Project would not involve the development of new housing and/or structures within an identified 100-year flood hazard. Impacts would be less than significant. No further analysis is required.

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

Less Than Significant Impact. See response to **Section 9(g)**, above. Impacts would be less than significant. No further analysis is required.

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?

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87 As per *FEMA Flood Insurance Rate Map No. 06037C1590F, effective as of 09/26/2008, accessed December 9, 2016. The map can be accessed by following the directions provided through this portal: https://msc.fema.gov/portal.*

Less than significant impact. A significant impact may occur if a project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam, including but not limited to a seismically-induced seiche, which is a surface wave created when a body of water is shaken, which could result in a water storage facility failure.

According to USGS topographic maps (https://viewer.nationalmap.gov/basic/) the site and the surrounding areas are not located within a flood hazard area. The Project Site is not located within a potential inundation area.[88] The perimeter bordering the proposed development site is classified as an area with 1 percent annual chance of flooding. However, as indicated on the Project Site plans, there would be a 10 feet perimeter, and a natural habitat preserve on the areas with flooding risk, therefore not exposing housing or structures to areas of flooding and/or inundation. Accordingly, the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving flooding. As such, there would be no impacts related to potential inundation from the failure of a levee or dam. No further analysis is required.

j) Inundation by seiche, tsunami, or mudflow?

Less than significant impact. A significant impact would occur if the proposed project would be located within an area susceptible to inundation by seiche, tsunami, or mudflow. A seiche is a periodic oscillation of a body of water resulting from seismic shaking or other causes that can cause flooding. The Project Site is located within a coastal area, with the Pacific Ocean approximately 2.5 miles to the west. The Department of Water and Power (DWP) addresses regulation of water and providing walls of extra height in coastal areas to contain seiches and prevent overflow. Additionally, the City Flood Hazard Specific Plan sets forth design criteria for developments in coastal zones, including increase base building elevations. Adherence to these standards would mitigate potential impacts of seiches to less than significant.[89]

A tsunami is a series of waves generated by large earthquakes that create vertical movement on the ocean floor. Tsunamis can reach more than 50 feet in height, move inland several hundred feet, and threaten life and property. Often, the first wave of a tsunami is not the largest. Tsunamis can occur on all coastal regions of the world, but are most common along margins of the Pacific Ocean. Tsunamis can travel from one side of the Pacific to the other in a day, at a velocity of 600 miles an hour in deep water. A locally generated tsunami may reach the shore within minutes. Due to its proximity to the coast, and according to City of Los Angeles Safety Element, Exhibit G,

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88 As per *FEMA Flood Insurance Rate Map NO. 06037C1760F, effective as of 09/26/2008, accessed December 9, 2016. The map can be accessed by following the directions provided through this portal: https://msc.fema.gov/portal.*

89 *City of Los Angeles Safety Element, 1996*

the Project Site is susceptible to tsunamis.[90] However, as mentioned in the Safety Element of the General Plan, the City of Los Angeles has developed numerous regulations to address the issues from a potential tsunami. The City Flood Hazard Specific Plan sets forth design criteria for development in coastal zones, including increased base building elevations. The Army Corps is responsible for constructing and maintaining the breakwaters which are designed to mitigate damaging wave action. The Harbor Department works cooperatively with the Army Corps to maintain and protect breakwater facilities, and participates in the federal tsunami alert program to warn potentially affected properties. Adherence to these regulations would result in less than significant impacts regarding potential tsunamis.

In addition, given the developed nature of the project area, there are no features adjacent to the project area capable of inundating the site by mudflow. Thus, no impacts are anticipated with regard to the inundation by seiche, tsunami, or mudflow. No further analysis is required.

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[90] *City of Los Angeles Safety Element, Exhibit G, Inundation and Tsunami Hazard Areas, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf.*

10. LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

Less Than Significant Impact. A significant impact would occur if the proposed project would be sufficiently large or configured in such a way so as to create a physical barrier within an established community. A physical division of an established community is caused by an impediment to through travel or a physical barrier, such as a new freeway with limited access between neighborhoods on either side of the freeway, or major street closures.

The Project Site is located within the Palms – Mar Vista – Del Rey Community Plan Area, as established by the City's General Plan. The Project Site is currently vacant, paved, and fenced.

The Project Site is isolated from other developments due to its location on a peninsula bounded by the confluence of Ballona Creek to the north, the SR 90 Freeway to the northeast, vacant land to the east, and Centinela Creek to the south. The land uses within the general vicinity of the Project Site are characterized by a mix of light industrial, manufacturing, institutional, commercial, and single-family residential uses. The Project would develop the 121,493 square foot site with multi-family residential uses. The proposed project would not involve any street vacation or closure or result in development of new thoroughfares or highways. The proposed project, the construction of the new residential multi-family development on a vacant site adjacent to an urbanized area in Los Angeles, would not divide an established community. Therefore, impacts would be less than significant. No further analysis is required.

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?

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the project site, and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate.

The Project Site is located within the Palms – Mar Vista – Del Rey Community Plan and designated for Light Industrial land uses and is zoned [T][Q]M2-1. The General Plan land use designation for the Project Site is Light Industrial. The Palms–Mar Vista–Del Rey Community Plan includes several goals, objectives, and policies that would be applicable to the Proposed

Project. The project is also located within the Los Angeles Coastal Transportation Specific Plan with built-in policies to fund specific transportation improvements from transportation impacts generated by new development. It also provides for area specific development standards that would encourage various modes of transportation.

City of Los Angeles Planning and Zoning Code

All on-site development activity is subject to the Planning and Zoning Code contained in the Los Angeles Municipal Code ("LAMC"). The Planning and Zoning Code includes development standards for the various districts in the City of Los Angeles. At present, the Project Site is zoned [T][Q]M2-1 (Light Industrial). This zone designates allowable development as follows:

- [T] for a Tentative Zone Classification – City Council requirements for public improvements as a result of a previous zone change.
- [Q] for a Qualified Classification – Restrictions on property as a result of a previous zone change, to ensure compatibility with surrounding property.
- M2 for Light Industrial uses – M1 (Limited Industrial) and MR2 (Restricted Light Industrial) uses, Additional Industrial Uses, Storage Yards, Animal Keeping, Enclosed Composting, No R Zone Uses
- Height District No. 1 – Unlimited height with a 1.5:1 Floor Area Ratio (FAR)

The Proposed Project is seeking a Vesting Zone Change from [T][Q]M2-1 (Light Industrial) to [T][Q]R4-1 (High Medium Residential) in order to accommodate the proposed development. This would allow for the development of up to 303 multifamily dwelling units with a 3:1 FAR and no height limitation. The Proposed Project proposes 236 dwelling units with a FAR of 1.93:1 and building height of 56 feet.

Height District

The proposed R4 zone will be with Height District No. 1. This limits the site to a 3:1 FAR, with no height limit. However, the Project would be limited to 56 feet in height (a 6-story building) and an FAR of 1.93:1.

Parking Requirements

Parking requirements for multiple residential developments are subject to the Planning and Zoning Code. Pursuant the Planning and Zoning Code, the following parking will be provided: 1 space per studio unit for 40 required, 1.5 spaces per one bedroom units for 167 required, 2 spaces per two bedroom units for 162 required and 2 spaces per three bedroom units for 12 required, for

a required 381 off street parking spaces. The Proposed Project will provide additional parking spaces for a total of 406 off street parking spaces. The Project will improve 69 parking spaces (17% of the 406 parking spaces) with Electric Vehicle Charging Stations.

Setback Requirements

Pursuant to City of Los Angeles Zoning and Planning Code, within the proposed R4 zone, front yard setbacks are 15 ft; R4 side setbacks detail: 10 percent lot width < 50 ft.; 5 ft.; 3 ft. min.; + 1 ft. for each story over 2nd, not to exceed 16 ft. R4 rear setback detail: 15 feet + 1 feet for each story over the third story; 20 feet maximum. The location of front, side, and rear yards will be determined by the Advisory Agency or LADBS. The Proposed Project is not requesting any deviations from yard requirements.

Ballot Measure JJJ

On November 8, 2016, voters in the City of Los Angeles approved and passed Ballot Measure JJJ, the Build Better LA initiative. Among other provisions, this ballot initiative imposes minimum affordable housing requirements and labor regulations on certain development projects requiring certain General Plan Amendments, Zone Changes, and Height District Changes. As a result of the Council's action on December 13, 2016 to certify the election results, the provisions of the initiative are now in effect.

Any development project that 1) will result in ten or more residential dwelling units, and 2) requires a General Plan Amendment, Zone Change, and/or Height District Change that results in increased allowable residential floor area, density, height, or allows a residential use where previously not allowed, is subject to the provisions of Measure JJJ, with the exception of a project with a Vesting Zone Change, Vesting Tentative Map, or Vesting Conditional Use Permit, the applications for which were deemed complete by the Department of City Planning as of December 13, 2016.

In accordance with Ballot Measure JJJ, as a project that allows a residential use where previously not allowed, 5 percent (12 units) of the 236 dwelling units proposed will be set aside for Extremely Low Income, and 11 percent (26 units) will be set aside for Very Low Income Housing, for a total of 38 affordable units.

Requested Discretionary Applications or Actions

The City of Los Angeles Planning Department is the lead agency for the Proposed Project. Discretionary entitlements, reviews, and approvals required for implementation of the project would include, but would not necessarily be limited to, the following:

- Approval of a General Plan Amendment from Light Industrial to High Medium Residential;
- Approval of a Vesting Zone Change from [T][Q]M2-1 (Light Industrial) to [T][Q]R4-1 (High Medium Residential) per LAMC Section 12.32. Q.3.A;
- Approval of Site Plan Review (SPR) findings per LAMC Section 16.05 for a development project which creates or results in an increase of 50 or more dwelling units;
- Approval of a Private Street;
- Approval of a Development Agreement;
- Adoption of the Expanded Initial Study/Mitigated Negative Declaration (IS/MND); and
- Approval of other permits, ministerial or discretionary, may be necessary in order to execute and implement the Project. Such approvals may include, but are not limited to: landscaping approvals, exterior approvals, storm water discharge permits, grading permits, haul route permits, and installation and hookup approvals for public utilities and related permits.

Land Use Compatibility

The *L.A. CEQA Thresholds Guide 2006* addresses land use compatibility as it relates to assessing impacts on surrounding land uses. Evaluating the significance of environmental impacts, i.e., physical impacts and changes to the environment, related to compatibility requires more than merely comparing the physical attributes of the proposed building to the physical attributes of buildings adjacent to the Project Site and in the surrounding area. A significant impact is not generated simply because a proposed building is different than some of the buildings or even many of the buildings in the surrounding area. For purposes of evaluating environmental impacts related to compatibility, it is useful to address the functional compatibility of the Proposed Project with its surrounding land uses. Functional compatibility is defined as the capacity for adjacent, yet dissimilar land uses to maintain and provide services, amenities, and/or environmental quality associated with such uses. Potentially significant functional land use compatibility impacts may be generated when a Proposed Project hinders the functional patterns of use and relationships associated with existing land uses. Patterns of use relate to the interaction and movement of people, goods, and/or information.

The physical compatibility of the Proposed Project with its environs is based on an analysis of proposed uses and improvements and their potential on-site and off-site impacts on traffic, noise, air quality, and aesthetics. These impacts, together with proposed mitigation measures, where

applicable, are discussed in their respective sections of this Initial Study. As such, this section focuses on the compatibility of the Proposed Project from a functional perspective.

The Project Site is located in the Palms - Mar Vista - Del Rey community, which is generally characterized by a mix of residential, commercial, industrial, and institutional uses. The area surrounding the Project Site is developed with varying uses, including, but not limited to: light industrial, manufacturing, institutional, commercial, single-family residential, and surface parking areas. Due to the diversity of uses in the area, the proposed multi-family residential use of the Project is compatible to the uses surrounding the Project Site.

As provided in **Section 1, Aesthetics**, the building height and massing that would be developed with the implementation of the Proposed Project would create a change in the visual character of the Project Site from what currently exists, and would not be compatible in scale, massing, or style with existing structures immediately adjacent. However, it would be compatible with the general urban character of the Playa Vista community approximately 0.25 miles to the south of the site. As the Proposed Project would include similar uses to those of the surrounding area and be consistent with the scale of surrounding development, no significant impacts would result from the Proposed Project with regard to land use functional compatibility.

Consistency with SB 375

The Proposed Project does not conflict with the mandate of Senate Bill (SB) 375. The Project Site is adjacent to an urbanized neighborhood that is served by bus routes operated by Metro, Culver CityBus, and LADOT. The availability of various transit routes to residents would be consistent with SB 375's goal of reducing the amount of on-road single occupancy vehicles (SOV) and vehicle miles traveled (VMT).

Regional access to the project site is provided by the SR 90 Freeway, which is immediately adjacent to but not directly accessible form the Site, and the San Diego Freeway (I-405), which is approximately 1.5 miles east of the Site. However, the subject site is isolated from other developments due to its location on a peninsula bounded by the confluence of Ballona Creek to the north, the SR 90 Freeway to the northeast, vacant land to the east, and Centinela Creek to the south. The nearest adjacent structures are office and manufacturing uses approximately 100 feet to the south and 400 feet to the north, and single-family residences approximately 400 feet to the northeast. The nearest roadway is Beethoven Street, which ends in a cul de sac approximately 200 feet to the south. The Project proposes a vehicular bridge to connect to Beethoven Street to provide vehicular access to the site. The Project would involve the extension of infrastructure including roads, sewer, storm drains, etc. to serve the subject site. The Proposed Project would be within walking distance to a variety of shops and services for residents (e.g., personal grooming

services, medical/dental offices, restaurants, etc.) that would further reduce the need for vehicle trips and associated GHG emissions. The Proposed Project would also incorporate pedestrian and bicycle improvements (sidewalks and pathways) and amenities for bicycles, to encourage users of the site to arrive on foot or bicycle.

The location of the Project Site is adjacent to an existing urbanized neighborhood that is served by public transit.

Consistency with Land Use Plans

As previously discussed, the development of the Proposed Project would be subject to numerous City land use plans as well as the development regulations in the LAMC. The decision makers will determine whether discretionary requests will conflict with applicable plans/policies. The Proposed Project's consistency with the policies and goals of applicable land use plans and policy documents, including SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the City of Los Angles General Plan Framework Element, Mobility Element, Housing Element, and the Palms – Mar Vista – Del Rey Community Plan are discussed below. As required by CEQA, the Proposed Project's consistency with the AQMP is addressed in **Section 3, Air Quality**, and the Proposed Project's consistency with the CMP is addressed in **Section 16, Transportation/Traffic**, of this Initial Study.

SCAG Regional Comprehensive Plan and Guide

On April 7, 2016, SCAG adopted the 2016 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life (2016 RTP/SCS). The 2016 RTP/SCS includes the long-term vision of how the SCAG region would address regional transportation and land use challenges and opportunities. The Proposed Project would be consistent with the goals and policies set forth in the 2016 RTP/SCS, as the Proposed Project would develop a vacant site that is adjacent to an urbanized area that is served by public transit into residential uses. The Proposed Project would thereby increase utilization of a property that is accessible by transit. Furthermore, as the Proposed Project would result in a net increase of 236 dwelling units which would generate approximately 685 new residents in the project area, the Proposed Project would be consistent with the SCAG growth projections.

City of Los Angeles General Plan

The Proposed Project would conform to objectives outlined in the City of Los Angeles General Plan (General Plan). The General Plan is a comprehensive, long-range declaration of purposes, policies and programs for the development of the City. The General Plan is a dynamic document

consisting of 11 elements: Framework Element, Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Service Systems Element / Public Recreation Plan, Safety Element, Mobility Element, A Plan for a Healthy Los Angeles, and the Land Use Element. The Land Use Element is comprised of 35 Community Plans. The elements that would be most applicable to the Proposed Project are the Framework Element, Mobility Plan, Housing Element, and Land Use Element (Palms – Mar Vista – Del Rey Community Plan).

Framework Element

The General Plan's Framework Element provides citywide guidelines and a foundation upon which Community Plans and other General Plan Elements can base their more specific goals, objectives, and policies. The General Plan's Framework Element was adopted on December 11, 1996 and re-adopted on August 8, 2001. The Framework Element and the City's community plans discuss population, housing and employment to the year 2010. The Framework Element identifies a projected population of 4.3 million people living in 1,566,108 housing units. The Citywide General Plan Framework and the West Los Angeles Community Plan provide growth projections and CPA capacity, respectively, for the year 2010. The West Los Angeles Community Plan recognizes that the Community Plan Area (CPA) may grow that population, jobs, and housing could grow more quickly, or slowly, than anticipated depending on economic trends.

As shown in **Table IV-12, Consistency of the Proposed Project with the Applicable Objectives and Policies of the City of Los Angeles General Plan Framework Element**, the Proposed Project would not conflict with the objectives and policies identified in the Framework Element of the General Plan that are adopted for the purpose of avoiding or mitigating an environmental effect. The Proposed Project advances several goals, objectives, and policies related to residential development and affordable housing. In addition, the Project's environmental impacts were analyzed in other Sections of the Initial Study, and mitigation measures have been imposed where necessary to ensure environmental impacts are less than significant.

Table IV-12
Consistency of the Proposed Project with the Applicable Objectives and Policies of the City of Los Angeles General Plan Framework Element*

Goals/Objectives/Policies	Evaluation of Project Consistency
Land Use Chapter	
Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of	**No Conflict.** The Proposed Project will develop a vacant site that is designated for industrial uses into a multi-family residential development. The site is adjacent to an urbanized neighborhood and served by bus transit, and will contribute to a diversity of uses in the neighborhood. The Proposed Project will

Goals/Objectives/Policies	Evaluation of Project Consistency
natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more liveable city.	construct a vehicular bridge and pedestrian/bicycle bridge to provide access to the site, and will provide sewer and stormwater connections to accommodate the project. Two natural habitat preserves will be provided on the eastern and western ends of the Project Site. The Project's impacts were analyzed in Section 16, Transportation and Traffic, and mitigation measures are imposed where necessary to ensure that impacts are less than significant. The TDM&MP, pedestrian improvements, and bicycle amenities encourage users of the site to arrive on foot or bicycle.
Objective 3.2: To provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.	**No Conflict.** The Proposed Project concentrates new residential development on a vacant site that is adjacent to an urbanized neighborhood and served by bus transit. The Proposed Project will construct a vehicular bridge and pedestrian/bicycle bridge to provide access to the site. The Project's impacts were analyzed in Section 1, Aesthetics, and Section 16, Transportation and Traffic, and mitigation measures are imposed where necessary to ensure that impacts are less than significant. The TDM&MP, pedestrian improvements, and bicycle amenities encourage users of the site to arrive on foot or bicycle.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	**No Conflict.** The Proposed Project concentrates new residential development on a vacant site that is adjacent to an urbanized neighborhood and served by bus transit. The site is isolated from and therefore will not adversely impact the surrounding neighborhoods and districts. The nearest adjacent structures are office and manufacturing uses approximately 100 feet to the south and 400 feet to the north, and single-family residences approximately 400 feet to the northeast. The Proposed Project would serve the City's projected growth and demand, and will not encroach upon or cause the removal or relocation of uses in the area.
Goal 3C: Multi-family neighborhoods that enhance the quality of life for the City's existing and future residents.	**No Conflict.** The Proposed Project concentrates new residential development on a vacant site that is adjacent to an urbanized neighborhood and served by bus transit. The site is isolated from and therefore will not adversely impact the single-family residential neighborhood approximately 400 feet to the northeast of the site. The project proposes 236 residential units with anticipated growth of 685 residents on a site where residential uses are currently not allowed. The Proposed Project will construct a vehicular bridge and pedestrian/bicycle

Goals/Objectives/Policies	Evaluation of Project Consistency
	bridge to provide access to the site, and will provide sewer and stormwater connections to accommodate the project. The Proposed Project incorporates design features to encourage pedestrian and bicycling activity, including landscaping, an extension of the local bicycle path, and bicycle parking.
Objective 3.7: Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved.	**No Conflict.** The Proposed Project concentrates new residential development on a vacant site that is adjacent to an urbanized neighborhood and served by bus transit. The site is isolated from and therefore will not adversely impact the single-family residential neighborhood approximately 400 feet to the northeast of the site. The project proposes 236 residential units with anticipated growth of 685 residents on a site where residential uses are currently not allowed. The Proposed Project will construct a vehicular bridge and pedestrian/bicycle bridge to provide access to the site, and will provide sewer and stormwater connections to accommodate the project. The project will increase bicycle and pedestrian connections to the site, and encourages vehicular access where none currently exists.
Goal 3J: Industrial growth that provides job opportunities for the City's residents and maintains the City's fiscal viability.	**No Conflict.** Development of the Proposed Project would convert land zoned for industrial use to residential use. This change would result in a loss of industrial land within the Plan area, however the site is currently vacant, therefore there would be no displacement of industrial uses. Policy 3.14.6 of the Framework Element allows re-designation of marginal industrial lands for alternative uses by amending the community plans where existing parcelization precludes effective use for industrial or supporting functions, where the size and/or configuration of assembled parcels are insufficient to accommodate viable industrial development, and where available infrastructure is inadequate to support the needs of industrial uses.
Objective 3.14: Provide land and supporting services for the retention of existing and attraction of new industries.	**No Conflict.** Development of the Proposed Project would convert land zoned for industrial use to residential use. This change would result in a loss of industrial land within the Plan area, however the site is currently vacant, therefore there would be no displacement of industrial uses. Policy 3.14.6 of the Framework Element allows re-designation of marginal industrial lands for alternative uses by amending the community plans where existing parcelization precludes effective use for industrial or

Goals/Objectives/Policies	Evaluation of Project Consistency
	supporting functions, where the size and/or configuration of assembled parcels are insufficient to accommodate viable industrial development, and where available infrastructure is inadequate to support the needs of industrial uses.
Policy 3.14.6: Consider the potential re-designation of marginal industrial lands for alternative uses by amending the community plans based on the following criteria: a. Where it can be demonstrated that the existing parcelization precludes effective use for industrial or supporting functions and where there is no available method to assemble parcels into a unified site that will support viable industrial development; b. Where the size and/or the configuration of assembled parcels are insufficient to accommodate viable industrial development; c. Where the size, use, and/or configuration of the industrial parcels adversely impact adjacent residential neighborhoods; d. Where available infrastructure is inadequate and improvements are economically infeasible to support the needs of industrial uses; e. Where the conversion of industrial lands to an alternative use will not create a fragmented pattern of development and reduce the integrity and viability of existing industrial areas; f. Where the conversion of industrial lands to an alternative use will not result in an adverse impact on adjacent residential neighborhoods, commercial districts, or other land uses; g. Where it can be demonstrated that the reduction of industrial lands will not adversely impact the City's ability to accommodate sufficient industrial uses to provide jobs for the City's residents or incur adverse fiscal impacts; and/or h. Where existing industrial uses constitute a hazard to adjacent residential or natural areas.	**No Conflict.** Development of the Proposed Project would convert land zoned for industrial use to residential use. This change would result in a loss of industrial land within the Plan area, however the site is currently vacant, therefore there would be no displacement of industrial uses. The subject site is isolated from other developments due to its location on a triangular shaped site on a peninsula bounded by the confluence of Ballona Creek to the north, the SR 90 Freeway to the northeast, vacant land to the east, and Centinela Creek to the south, and vacant land to the east. The parcelization, size, and configuration of existing parcels are insufficient and preclude effective use for industrial development. Access to the site is currently limited, and there is a lack of existing infrastructure and improvements to support the needs of industrial uses, such as roads, sewer, storm drains, and other utilities. The site is physically isolated from other industrial development due to the Centinela Creek to the south, and will not create a fragmented pattern of development nor reduce the integrity of the existing industrial areas. The site is physically isolated from other residential uses due to the SR 90 Freeway and Ballona Creek to the north and northeast, and will not result in an adverse impact on adjacent residential neighborhoods.
Housing Chapter	
Goal 4A: An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.	**No Conflict.** The Project would provide up to 236 new housing units to meet housing needs established in the periodically updated SCAG Regional Housing Needs Assessment as implemented through the Housing Element of the General Plan. The new units would include a range of sizes consisting of studios, one bedroom, two-bedroom, and three-bedroom units. Development of the Proposed Project would

Goals/Objectives/Policies	Evaluation of Project Consistency
	support this objective by providing 38 units of affordable housing in compliance with Ballot Measure JJJ.
Objective 4.1: Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion to meet the projected housing needs by income level of the future population to the year 2010.	**No Conflict.** The Project would provide up to 236 new housing units to meet housing needs established in the periodically updated SCAG Regional Housing Needs Assessment as implemented through the Housing Element of the General Plan. The new units would include a range of sizes consisting of studios, one bedroom, two-bedroom, and three-bedroom units. Development of the Proposed Project would support this objective by providing 38 units of affordable housing in compliance with Ballot Measure JJJ.
Policy 4.1.1: Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City subregion to meet the twenty-year projections of housing needs.	**No Conflict.** The Project would provide up to 236 new housing units to meet housing needs established in the periodically updated SCAG Regional Housing Needs Assessment as implemented through the Housing Element of the General Plan. The new units would include a range of sizes consisting of studios, one bedroom, two-bedroom, and three-bedroom units. Development of the Proposed Project would support this objective by providing 38 units of affordable housing in compliance with Ballot Measure JJJ.
Open Space and Conservation	
Goal 6A: An integrated citywide/regional public and private open space system that serves and is accessible by the City's population and is unthreatened by encroachment from other land uses.	**No Conflict.** The Proposed Project concentrates new residential development on a vacant site bounded by the Centinela and Ballona Creeks. The site is not designated for open space and has been previously used for shipping containers. The Project will construct a pedestrian/bicycle bridge to connect to the Ballona Creek Bike Path, which is identified on the General Plan Framework's Citywide Greenways Network Map, from the community to the south. The Project proposes two wildlife sanctuary areas, bicycle and pedestrian pathways, and green belt along the perimeter of the site to serve as a buffer.
Objective 6.2: Maximize the use of the City's existing open space network and recreation facilities by enhancing those facilities and providing connections, particularly from targeted growth areas, to the existing regional and community open space system.	**No Conflict.** The Proposed Project concentrates new residential development on a vacant site bounded by the Centinela and Ballona Creeks. The site is not designated for open space and has been previously used for shipping containers. The Project will construct a pedestrian/bicycle bridge to connect to the Ballona Creek Bike Path, which is identified on the General Plan Framework's Citywide Greenways Network Map, from the community to the south. The

Goals/Objectives/Policies	Evaluation of Project Consistency
	Project proposes two wildlife sanctuary areas, bicycle and pedestrian pathways, and green belt along the perimeter of the site to serve as a buffer.
Policy 6.4.3: Encourage appropriate connections between the City's neighborhoods and elements of the Citywide Greenways Network.	**No Conflict.** The Proposed Project concentrates new residential development on a vacant site bounded by the Centinela and Ballona Creeks. The site is not designated for open space and has been previously used for shipping containers. The Project will construct a pedestrian/bicycle bridge to connect to the Ballona Creek Bike Path, which is identified on the General Plan Framework's Citywide Greenways Network Map, from the community to the south.

* This table lists only those policies that are applicable to the Proposed Project.
Source: The Citywide General Plan Framework Element, website: http://cityplanning.lacity.org/Framework.html; Impact Sciences, September 2016.

City of Los Angeles General Plan Housing Element

The Housing Element 2013-2021 of the City's General Plan identifies goals and objectives for the production of housing. As shown in **Table IV-13a, Consistency of the Proposed Project with the Applicable Objectives and Policies of the City of Los Angeles General Plan Housing Element**, the Proposed Project would not conflict with the objectives and policies identified in the Housing Element of the General Plan that are adopted for the purpose of avoiding or mitigating an environmental effect.

Table IV-13a
Consistency of the Proposed Project with the Applicable Objectives and Policies of the City of Los Angeles General Plan Housing Element*

Goals/Objectives/Policies	Evaluation of Project Consistency
Goal 1: A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy and affordable to people of all income levels, races, ages, and suitable for their various needs.	**No Conflict.** The Project would provide up to 236 new housing units to meet housing needs established in the periodically updated SCAG Regional Housing Needs Assessment as implemented through the Housing Element of the General Plan. The new units would include a range of sizes consisting of studios, one bedroom, two-bedroom, and three-bedroom units. Of the 23 housing units proposed, 12 units will be set aside for Extremely Low Income and 26 units will be set aside for Very Low Income in compliance with Ballot Measure JJJ.
Goal 2: A City in which housing helps to create safe, livable and sustainable neighborhoods.	**No Conflict.** The Proposed Project concentrates new residential development on a vacant site that is adjacent to an urbanized neighborhood and served by bus transit. The site is isolated from and therefore will not adversely impact the single-family residential neighborhood

Goals/Objectives/Policies	Evaluation of Project Consistency
	approximately 400 feet to the northeast. The project proposes 236 residential units with anticipated growth of 685 residents on a site where residential uses are currently not allowed. The Proposed Project will construct a vehicular bridge and pedestrian/bicycle bridge to provide access to the site, and will provide sewer and stormwater connections to accommodate the project. Two natural habitat preserves will be provided on the eastern and western ends of the Project Site.. The project will increase bicycle and pedestrian connections to the site, and encourage users of the site to arrive on foot or bicycle.

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* This table lists only those policies that are applicable to the Proposed Project.
Source: The Citywide General Plan Housing Element, website: https://planning.lacity.org/HousingInitiatives/HousingElement/Text/HousingElement_20140321.pdf.

Mobility Plan 2035 Element

The Mobility Plan 2035 ("Mobility Plan") of the City of Los Angeles General Plan, adopted September 7, 2016, is designed to provide a policy foundation for the transportation system within the City of Los Angeles. As shown in **Table IV-13b, Consistency of the Proposed Project with the Applicable Objectives and Policies of the City of Los Angeles General Plan Mobility Plan 2035**, the Proposed Project would not conflict with the objectives and policies identified in the Mobility Plan 2035 that are adopted for the purpose of avoiding or mitigating an environmental effect. The Project's environmental impacts were analyzed in other Sections of the Initial Study, and mitigation measures have been imposed where necessary to ensure environmental impacts are less than significant.

Table IV-13b
Consistency of the Proposed Project with the Applicable Objectives and Policies of the City of Los Angeles Mobility Plan 2035*

Goals/Objectives/Policies	Evaluation of Project Consistency
Policy 3.1: Access for All: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes - including goods movement – as integral components of the City's transportation system.	**No Conflict.** The Proposed Project concentrates new residential development on a vacant site that is adjacent to an urbanized neighborhood and served by bus transit. The Proposed Project will construct a vehicular bridge and pedestrian/bicycle bridge to provide access to the site. The Project's impacts were analyzed in Section 16, Transportation and Traffic, and mitigation measures are imposed where necessary to ensure that impacts are less than significant. The TDM&MP, pedestrian improvements, and bicycle amenities encourage users of the site to arrive on foot or bicycle.

Goals/Objectives/Policies	Evaluation of Project Consistency
Policy 3.3: Land Use Access and Mix: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.	**No Conflict.** The Proposed Project concentrates new residential development on a vacant site that is adjacent to an urbanized neighborhood and served by bus transit. The project proposes 236 residential units with anticipated growth of 685 residents on a site where residential uses are currently not allowed. The Proposed Project will construct a vehicular bridge and pedestrian/bicycle bridge to provide access to the site. The Project's impacts were analyzed in Section 16, Transportation and Traffic, and mitigation measures are imposed where necessary to ensure that impacts are less than significant. The TDM&MP, pedestrian improvements, and bicycle amenities encourage users of the site to arrive on foot or bicycle.
Policy 3.5: Multi-Modal Features: Support "first-mile, last-mile solutions" such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.	**No Conflict.** The Proposed Project concentrates new residential development on a vacant site that is adjacent to an urbanized neighborhood and served by bus transit. The project proposes 236 residential units with anticipated growth of 685 residents on a site where residential uses are currently not allowed. The Proposed Project will construct a vehicular bridge and pedestrian/bicycle bridge to provide access to the site. The Project's impacts were analyzed in Section 16, Transportation and Traffic, and mitigation measures are imposed where necessary to ensure that impacts are less than significant. The TDM&MP, pedestrian improvements, and bicycle amenities encourage users of the site to arrive on foot or bicycle.

* This table lists only those policies that are applicable to the Proposed Project.
Source: The Citywide General Plan Mobility Plan 2035, website: https://planning.lacity.org/documents/policy/mobilityplnmemo.pdf.

Palms - Mar Vista - Del Rey Community Plan

Consistency with Community Plan Land Use Designation

The Community Plan is part of the Land Use Element of the Citywide General Plan, and sets forth specific land use requirements and required entitlements for projects in a specific community within the City. Both the General Plan Framework Element and the Community Plan Land Use Diagram designate the Project Site as Light Industrial. However, the land uses in the Project vicinity vary and exhibit a diversity of development, including single-family residences in the R1-1 zone; commercial, office, manufacturing, and institutional (school) uses in the M1-1 zone; and vacant land along the Creek zoned A1-1, A1-1XL, OS-1XL, and PF-1XL. The proposed Project includes a General Plan Amendment and Vesting Zone Change from [T][Q]M2-1 (Light

Industrial) to [T][Q]R4-1 (High Medium Residential). Overall, the Proposed Project would be consistent with the proposed High Medium Residential land use designation found in the Community Plan.

Consistency with Community Plan Objectives

As shown in **Table IV-13c, Comparison of Palms - Mar Vista - Del Rey Community Plan Objectives to Proposed Project Characteristics**, the Proposed Project would not conflict with the objectives and policies of the Community Plan that are adopted for the purpose of avoiding or mitigating an environmental effect. The Project's environmental impacts were analyzed in other Sections of the Initial Study, and mitigation measures have been imposed where necessary to ensure environmental impacts are less than significant.

Table IV-13c
Comparison of Palms - Mar Vista - Del Rey Community Plan Objectives to Proposed Project Characteristics*

Goals/Objectives/Policies	Consistency of the Proposed Project
Land Use Policies and Programs	
Goal 1: A safe, secure and high quality residential environment for all community residents.	**No Conflict.** The Proposed Project concentrates new residential development on a vacant site that is adjacent to an urbanized neighborhood and served by bus transit. The project proposes 236 residential units with anticipated growth of 685 residents on a site where residential uses are currently not allowed. The Proposed Project will construct a vehicular bridge and pedestrian/bicycle bridge to provide access to the site. The Proposed Project incorporates design features to encourage pedestrian and bicycling activity, including landscaping, an extension of the local bicycle path, and bicycle parking.
Objective 1-1: To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of existing residents and project population of the Plan area to the year 2010.	**No Conflict.** The Project would provide up to 236 new housing units to meet housing needs established in the periodically updated SCAG Regional Housing Needs Assessment as implemented through the Housing Element of the General Plan. The new units would include a range of sizes consisting of studios, one bedroom, two-bedroom, and three-bedroom units. Of the 23 housing units proposed, 12 units will be set aside for Extremely Low Income and 26 units will be set aside for Very Low Income in compliance with Ballot Measure JJJ. The site is currently vacant and does not contain residential uses. Therefore, no dwelling units or residents would be displaced.
Objective 1-2: To reduce vehicular trips and congestion by developing new housing in proximity to adequate services and facilities.	**No Conflict.** The Proposed Project concentrates new residential development on a vacant site that is adjacent to an urbanized neighborhood and served by bus transit. The

Goals/Objectives/Policies	Consistency of the Proposed Project
	project proposes 236 residential units with anticipated growth of 685 residents on a site where residential uses are currently not allowed. The Proposed Project will construct a vehicular bridge and pedestrian/bicycle bridge to provide access to the site, and will provide sewer and stormwater connections to accommodate the project. The Project's impacts were analyzed in Section 16, Transportation and Traffic, and mitigation measures are imposed where necessary to ensure that impacts are less than significant. The TDM&MP, pedestrian improvements, and bicycle amenities encourage users of the site to arrive on foot or bicycle.
Policy 1-3.2: Proposals for change to planned residential density should consider factors of neighborhood character and identity, compatibility of land uses, impacts on livability, public services and facilities and on traffic levels.	**No Conflict.** The site is currently designated for Light Industrial land uses and is zoned [T][Q]M2-1, which does not allow residential uses, The applicant has requested a General Plan Amendment and Vesting Zone Change to High Medium Residential land use designation and [T][Q]R4-1 zoning designation to allow residential development on-site. The Project proposes 236 residential units with anticipated growth of 685 residents, which is allowed under the requested land use and zoning designation. The site is currently vacant and is adjacent to an urbanized neighborhood and served by bus transit. The Proposed Project will construct a vehicular bridge and pedestrian/bicycle bridge to provide access to the site, and will provide sewer and stormwater connections to accommodate the project. The Project's impacts were analyzed in Section 16, Transportation and Traffic, and mitigation measures are imposed where necessary to ensure that impacts are less than significant. The TDM&MP, pedestrian improvements, and bicycle amenities encourage users of the site to arrive on foot or bicycle.
Objective 1-4: To promote adequate and affordable housing and increase its accessibility to more segments of the population, especially students and senior citizens.	**No Conflict.** Development of the Proposed Project would support this objective by providing 38 units of affordable housing in compliance with Ballot Measure JJJ.
Policy 1-4.1: Promote greater individual choice in type, quality, price and location of housing.	**No Conflict.** The Project would provide up to 236 new housing units to meet housing needs established in the periodically updated SCAG Regional Housing Needs Assessment as implemented through the Housing Element of the General Plan. The new units would include a range of sizes consisting of studios, one bedroom, two-bedroom, and three-bedroom units. Development of the Proposed Project would support this objective by providing 38 units of affordable housing in compliance with Ballot Measure

Goals/Objectives/Policies	Consistency of the Proposed Project
	JJJ. Therefore, the Proposed Project would be consistent with this policy.
Policy 1.5-2: Ensure that new housing opportunities minimize displacement of residents.	**No Conflict**. The site is currently vacant and does not contain dwelling units. Therefore, no dwelling units or residents would be displaced.
Goal 3: Sufficient land for a variety of industrial uses with maximum employment opportunities which are environmentally sensitive, safe for the work force with minimal adverse impact on adjacent uses.	**No Conflict.** Development of the Proposed Project would convert land zoned for industrial use to residential use. This change would result in a loss of industrial land within the Plan area, however the site is currently vacant, therefore there would be no displacement of industrial uses. Policy 3.14.6 of the Framework Element allows re-designation of marginal industrial lands for alternative uses by amending the community plans where existing parcelization precludes effective use for industrial or supporting functions, where the size and/or configuration of assembled parcels are insufficient to accommodate viable industrial development, and where available infrastructure is inadequate to support the needs of industrial uses.
Objective 3-1: To provide a viable industrial base with job opportunities for residents with minimal environmental and visual impacts to the community.	**No Conflict.** Development of the Proposed Project would convert land zoned for industrial use to residential use. This change would result in a loss of industrial land within the Plan area, however the site is currently vacant, therefore there would be no displacement of industrial uses. Policy 3.14.6 of the Framework Element allows re-designation of marginal industrial lands for alternative uses by amending the community plans where existing parcelization precludes effective use for industrial or supporting functions, where the size and/or configuration of assembled parcels are insufficient to accommodate viable industrial development, and where available infrastructure is inadequate to support the needs of industrial uses.
Objective 11-1: To pursue transportation management strategies that can maximize vehicle occupancy, minimize average trip length and reduce the number of vehicle trips.	**No Conflict.** The Proposed Project concentrates new residential development on a vacant site that is adjacent to an urbanized neighborhood and served by bus transit. The Proposed Project will construct a vehicular bridge and pedestrian/bicycle bridge to provide access to the site. The Project's impacts were analyzed in Section 16, Transportation and Traffic, and mitigation measures are imposed where necessary to ensure that impacts are less than significant. The TDM&MP, pedestrian improvements, and bicycle amenities encourage users of the site to arrive on foot or bicycle.
Policy 11-1.3: Require that proposals for major new on-residential development projects include submission of a TDM Plan to the City.	**No Conflict.** The proposed Project is required per MM-TRA-2 to submit a Transportation Demand Management

Goals/Objectives/Policies	Consistency of the Proposed Project
	and Monitoring Program (TDM&MP) to the City to help reduce vehicle trips to and from the Project Site.

* This table lists only those objectives that are applicable to the Proposed Project.
Source: Palms - Mar Vista - Del Rey Community Plan adopted September 16, 1997, and Impact Sciences, March 2018.

Residential Citywide Design Guidelines

The City's General Plan Framework Element and each of the City's 35 Community Plans promote architectural and design excellence in buildings, landscape, open space, and public space. They also stipulate that preservation of the City's character and scale, including its traditional urban design form, shall be emphasized in consideration of future development. To this end, the Citywide Design Guidelines have been created to carry out the common design objectives that maintain neighborhood form and character while promoting design excellence and creative infill development solutions.

The Citywide Design Guidelines serve to implement the 10 Urban Design Principles, a part of the Framework Element. These principles are a statement of the City's vision for the future of Los Angeles providing guidance for new development and encouraging projects to complement existing urban form in order to enhance the built environment in Los Angeles. While called "urban," the Urban Design Principles reflect citywide values to be expressed in the built environment of the City, establishing a design program for the City. They are intended to embrace the variety of urban forms that exist within Los Angeles, from the most urban, concentrated centers to our suburban neighborhoods.

The 10 principles of urban design identified in the Citywide Design Guidelines are as follows:

1. Develop inviting and accessible transit areas
2. Reinforce walkability, bikeability and well-being
3. Nurture neighborhood character
4. Bridge the past and the future
5. Produce great green streets
6. Generate public open space
7. Stimulate sustainability and innovation in the city

8. Improve equity and opportunity

9. Emphasize early integration, simple processes and maintainable solutions

10. Ensure connections

Walkability Checklist

The purpose of the Walkability Checklist: Guidance for Entitlement Review (the "Walkability Checklist") is to guide the City of Los Angeles Department of City Planning, as well as developers, architects, engineers, and all community members in creating enhanced pedestrian movements, access, comfort, and safety throughout the City of Los Angeles. The Walkability Checklist provides a list of recommended strategies that projects should employ to improve the pedestrian environment in the public right-of-way and on private property. Each of the implementation strategies on the Walkability Checklist should be considered in a proposed project, although not all may be appropriate in every proposed project. While the Walkability Checklist is not a requirement of the Zoning Code, it provides a guide for consistency relating with the policies contained in the General Plan Framework Element. Incorporating these guidelines into a project's design encourages pedestrian activity, more adequate forms, and placemaking.

As discussed above, with the approval of the requested entitlements (including a General Plan Amendment and Vesting Zone Change), the Proposed Project would not conflict with applicable plans, policies, and zoning regulations. A general finding of consistency with an applicable plan, such as a Community Plan or General Plan, does not require strict consistency with every policy or with all aspects of a plan. Land use plans attempt to balance a wide range of competing interests, and a project need only be consistent with a plan overall: consequently, even though a project may deviate from some particular provisions of a plan, the City may still find the project consistent with that plan on an overall basis. *See*, *e.g.*, *Friends of Lagoon Valley v. City of Vacaville*, 154 Cal. App. 4th 807, 815 (2007). Therefore, because the Project would advance a range of planning policies articulated in the Community Plan, the Project is consistent overall with the General Plan, even if inconsistencies existed with other particular policies.

The proposed Project would also support the development of a multi-modal transportation system and promote regional mobility goals to reduce vehicle trips and infrastructure costs by committing to a Transportation Demand Management (TDM) Program that would include:[91]

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[91] Details of the TDM strategy can be found in Appendix D-3, *Transportation Demand Management and Monitoring Program (TDM&MP) 5000 South Beethoven Street, Los Angeles, March 18, 2018*.

- Provide an internal Transportation Management Coordination Program, with a designated on-site transportation coordinator. Provide the coordinator contact name and phone number to LADOT, once established.
- Provide a dedicated shuttle service. This shuttle will operate daily, at a peak frequency that adequately meets the travel needs of site residents.
- The Transportation Coordinator will survey incoming residents of the project, and periodically thereafter, to determine the desire for shuttle trips and the times that work best for employment and weekend leisure trips, and schedule the route and frequency accordingly based on destinations and estimated vehicle passenger loading.
- The route of the shuttle will initially follow the weekday/weekend service concept shown in the TDM&MP plan (provided in **Appendix D-3** of this MND). The weekday route will provide access to employment and entertainment/recreational destinations, while the weekend router will focus less on locations of employment. The route will be adjusted as necessary based on the resident survey efforts and passengers input.
- The Transportation Coordinator will provide a rideshare program and support for project tenants.
- The Transportation Coordinator will provide subsidized transit passes for eligible project tenants.
- The applicant will coordinate with LADOT to determine if the site would be eligible for one or more of the services to be provided by the future Mobility Hubs program (secure bike parking, bike share kiosks, and car-share parking spaces).
- Provide on site transit routing and schedule information
- Provide a program to discount transit passes for residents, through negotiated bulk purchasing of passes with transit providers or other means.
- Contribute a one-time fixed fee into the City's Bicycle Plan Trust Fund to implement bicycle improvements within the area near the proposed project. The amount of this fee is to be determined in consultation with LADOT and Council District 11 staff.
- Provide a Guaranteed Ride Home Program.
- Design the project to ensure a bicycle, pedestrian, and transit friendly environment.

A major supporting feature of the TDM Plan is the provision of good site access for vehicles, pedestrian, and bicycles. The project will provide this element by designing site circulation and

the access bridge to make accommodations for pedestrians, bicyclists and vehicles. The bridge will cross Ballona Creek and will be constructed with two roadway travel lanes and a sidewalk. Bicycles will share the travel lanes with vehicles, and signs and striping that support such shared conditions will be included in the final striping and signing plan for the bridge.

LADOT requires that projects pursuing a trip generation cap as traffic mitigation implement a Monitoring Plan to provide assurance that TDM measures are working as intended. The monitoring will include monitoring of actual trips until such time that the project has shown, for five consecutive years, at a minimum 85 percent occupancy, achievement of the peak hour trip volume requirements included in the TDM plan.

The implementation of the TDM program would help the project adhere to the Los Angeles Coastal Transportation Corridor Specific Plan. Impacts related to land use have been mitigated elsewhere, or are addressed through compliance with existing regulations. As such, impacts would be less than significant. No further analysis is required.

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

Less Than Significant Impact. A significant impact would occur if the proposed project were located within an area governed by a habitat conservation plan or natural community conservation plan. As previously stated in **Section 4, Biological Resources**, the project and the surrounding vicinity are not part of any adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. For this reason, construction and operation of the project would have no impact on any adopted habitat conservation plan. Further, the small quantity of habitat loss – albeit extremely low quality, associated with the project would be considered an insignificant effect, as a result of the amount of similar and higher value vegetation communities and land cover types within the region that are already held in conservation or designated as open space in Los Angeles County. As such, impacts would be less than significant. No further analysis is required.

11. MINERAL RESOURCES

Would the project:

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

No Impact. A significant impact would occur if the proposed project would result in the loss of availability of known mineral resources of regional value or locally-important mineral resource recovery site. The Project Site subject to the applicable land use and zoning requirements in the LAMC, particularly Chapter 1, General Provisions and Zoning (City of Los Angeles Planning and Zoning Code), it is subject to development standards for the various districts in the City of Los Angeles. The Project Site is zoned [T][Q]M2-1, and thus is not zoned for oil extraction and drilling, or mining of mineral resources[92], and there are no such sites at the Project Site. Further, the Project Site is not located in an identified Mineral Resource Zone in the City of Los Angeles General Plan Conservation Element[93].

The project would involve the development of a multi-family residential building, and would not involve any new oil or mineral extraction activities. Therefore, development of the project would not result in the loss of availability of a mineral resource that would be of value to the residents of the state or a locally-important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. Thus, the proposed project would not result in the loss of availability of any known, regionally- or locally-valuable mineral resource, and no impact associated with mineral resources would occur. No further analysis is required.

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?

No Impact. See response to **Section 11(a)**, above.

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92 *Sites with known mineral resources are generally known as Mineral Resource Zones (MRZ), as classified by the California Geologic Survey (CGS).*

93 *City of Los Angeles, Conservation Element Exhibit A Mineral Resources Map, http://planning.lacity.org/cwd/gnlpln/consvelt.pdf.*

12. NOISE

This section is based on the information provided in the Noise Appendix prepared by Impact Sciences, Inc. in 2017, which is incorporated herein by this reference, and provided in **Appendix C** to this Draft Initial Study.

Background

Fundamentals of Sound and Environmental Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady ambient noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway. **Table IV-15, Representative Environmental Noise Levels**, below, illustrates representative noise levels for the environment.

Table IV-15 Representative Environmental Noise Levels		
Common Outdoor Activities	**Noise Level (dBA)**	**Common Indoor Activities**
Threshold of Pain	—140—	Threshold of Pain
Jet Take-off at 300 feet	—125—	
	—110—	Rock Band
Jet Fly-over at 100 feet		
	—100—	
Jackhammer at 45 feet		
Gas Lawnmower at 3 feet		
	—90—	
		Food Blender at 3 feet
Diesel Truck going 50 mph at 50 feet	—80—	Garbage Disposal at 3 feet
Noisy Urban Area during Daytime		
Gas Lawnmower at 100 feet	—70—	Vacuum Cleaner at 10 feet
Commercial Area		Normal Speech at 3 feet
Heavy Traffic at 300 feet	—60—	
		Large Business Office
Quiet Urban Area during Daytime	—50—	Dishwasher in Next Room
Quiet Urban Area during Nighttime	—40—	Theater, Large Conference Room (background)
Quiet Suburban Area during Nighttime		
	—30—	Library
Quiet Rural Area during Nighttime		Bedroom at Night, Concert Hall (background)
	—20—	
		Broadcast/Recording Studio
	—10—	
Lowest Threshold of Human Hearing	—0—	Lowest Threshold of Human Hearing
Source: United States Occupational Safety & Health Administration, Noise and Hearing Conservation Technical Manual, 1999, California Department of Transportation, 1998.		

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

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

- L_{max} – The maximum instantaneous noise level experienced during a given period of time.

- L_{min} – The minimum instantaneous noise level experienced during a given period of time.

- Community Noise Equivalent Level: CNEL is an adjusted noise measurement scale of average sound level during a 24-hour period. Due to increased noise sensitivities during evening and night hours, human reaction to sound between 7:00 P.M. and 10:00 P.M. is as if it were actually 5 dBA higher than had it occurred between 7:00 A.M. and 7:00 P.M. From 10:00 P.M. to 7:00 A.M., humans perceive sound as if it were 10 dBA higher. To account for these sensitivities, CNEL is obtained by adding an additional 5 dBA to evening noise levels between 7:00 P.M. and 10:00 P.M. and 10 dBA to nighttime noise levels between 10:00 P.M. and 7:00 A.M. Because of this, 24-hour CNEL figures are always higher than their corresponding actual 24-hour averages.

Effects of Noise

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

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 45 dBA, moderate in the 45–60 dBA range, and high above 60 dBA. According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 decibels can cause hearing loss.[94] Examples of low daytime levels are isolated natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may

94 www.nidcd.nih.gov/health/noise-induced-hearing-loss

consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

Audible Noise Changes

People with normal hearing sensitivity can recognize small perceptible changes in sound levels of approximately 3 dBA. Changes of at least 5 dBA can be readily noticeable and may even cause community reactions. Sound level increases of 10 dBA or greater are perceived as a doubling in loudness and can provoke a community response from those so effected.[95]

Noise is most audible when traveling by direct line-of-sight, that is to say, an unobstructed visual path between noise source and receptor. Barriers that break line-of-sight between sources and receivers, such as walls and buildings, can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. Other factors such as the weather and reflecting or shielding also intensify or reduce the noise level at any given location.

In addition, noise levels from a particular source generally decline as distance to the receptor increases. Noise from stationary or point sources is reduced by about 6 dBA for every doubling of distance. Noise levels decrease as the distance from noise source to receiver increases. For each doubling of distance, noise from stationary sources ("point sources") can decrease by approximately 6 dBA over hard surfaces (i.e., reflective surfaces such as parking lots) and 7.5 dBA over soft surfaces (i.e., absorptive surfaces such as soft dirt and grass). For example, if a point source produces a noise level of 89 dBA at a reference distance of 50 feet, the noise level would be approximately 83 dBA at a distance of 100 feet, 77 dBA at 200 feet, etc. Noise generated by mobile sources can decrease by approximately 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of distance.

Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The manner in which older homes in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 dBA with closed windows. The exterior-to-interior reduction of newer homes is generally 30 dBA or more.

95 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2006.

Characteristics of Vibration

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

Vibration Definitions

Peak particle velocity (PPV) can be used to describe vibration impacts to both buildings and humans. PPV represents the maximum instantaneous peak of a vibration signal, and it is usually measured in inches per second.[96]

Root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on land uses. RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (VdB) is commonly used to measure RMS. The decibel notation acts to compress the range of numbers required to describe vibration.[97]

Effects of Vibration

High levels of vibration may cause physical personal injury or damage to buildings. However, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that can affect concentration or disturb sleep. Ground-borne vibration can also interfere with certain types of highly sensitive equipment or machines, especially imaging devices used in medical laboratories.

Perceptible Vibration Changes

Unlike noise, ground-borne vibration is not an environmental issue that most people experience every day. Background vibration levels in residential areas are usually well below the threshold of perception for humans, which is around 0.01 inches per second.[98] Perceptible indoor vibrations are most often caused by sources within buildings themselves, such as slamming doors. Typical outdoor sources of ground-borne vibration include construction equipment, trains, and traffic on rough roads. Traffic vibration from smooth and well-maintained roads is typically not perceptible.

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96 California Department of Transportation, Transportation and Construction Vibration Guidance Manual, September 2013.

97 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.

98 Ibid.

Noise Regulatory Setting

Federal

Currently, no federal noise standards regulate environmental noise associated with short-term construction or the long-term operations of development projects.

State

The State of California's 2003 General Plan Guidelines establishes county and city standards for acceptable exterior noise levels based on land use. These criteria are incorporated into land use planning processes to prevent or reduce noise and land use incompatibilities. **Table IV-16, Land Use Compatibility for Community Noise Environments,** illustrates State compatibility considerations between various land uses and exterior noise levels.

Table IV-16
Land Use Compatibility for Community Noise Environments

Land Use Category	Community Noise Exposure (dB, L_{dn} or CNEL)						
	55	60	65	70	75	80	
Residential - Low Density Single-Family, Duplex, Mobile Homes							
Residential - Multi-Family							
Transient Lodging - Motels Hotels							
	55	60	65	70	75	80	
Schools, Libraries, Churches, Hospitals, Nursing Homes							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arena, Outdoor Spectator Sports							
Playgrounds, Neighborhood Parks							

Table IV-16
Land Use Compatibility for Community Noise Environments

Land Use Category	Community Noise Exposure (dB, L_{dn} or CNEL)						
	55	60	65	70	75	80	
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Business Commercial and Professional							
Industrial, Manufacturing, Utilities, Agriculture							

Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

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

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

Clearly Unacceptable - New construction or development should generally not be undertaken.

Source: California Office of Planning and Research "General Plan Guidelines, Noise Element Guidelines (Appendix C)", 2003.

Title 24 of the California Code of Regulations codifies Sound Transmission Control requirements, which establishes uniform minimum noise insulation performance standards for new hotels, motels, dormitories, apartment houses, and dwellings other than detached single-family dwellings. Specifically, Title 24 states that interior noise levels attributable to exterior sources shall not exceed 45 dBA CNEL in any habitable room of new multi-family dwellings. Dwellings are to be designed so that interior noise levels will meet this standard for at least 10 years from the time of building permit application.

Local

City of Los Angeles

City of Los Angeles Municipal Code

The LAMC contains the following regulations applicable to the project's construction activities:

SEC.41.40. NOISE DUE TO CONSTRUCTION, EXCAVATION WORK—WHEN PROHIBITED.

(a) No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power drive drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.

Section 41.40(a) would prohibit project construction activities from occurring between the hours of 9:00 P.M. and 7:00 A.M., Monday through Friday. Subdivision (c), below, would further prohibit such activities from occurring before 8:00 A.M. or after 6:00 P.M. on any Saturday, or on any Sunday or national holiday.

(c) No person, other than an individual homeowner engaged in the repair or construction of his single-family dwelling shall perform any construction or repair work of any kind upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter I of this Code, or perform such work within 500 feet of land so occupied, before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair, or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specific…

Section 112.05 of the LAMC establishes noise limits for powered equipment and hand tools operated within 500 feet of residential zones. Of particular importance to project construction would be subdivision (a), which institutes a maximum noise limit of 75 dBA for the types of construction vehicles and equipment that would be necessary for project demolition and grading, especially.

SEC. 112.05. MAXIMUM NOISE LEVEL OF POWERED EQUIPMENT OR POWERED HAND TOOLS

Between the hours of 7:00 A.M. and 10:00 P.M., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:

(a) 75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;

(b) 75 dBA for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;

(c) 65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.

However, the LAMC goes on to note that these limitations would not necessarily apply if proven that the project's compliance therewith would be technically infeasible despite the use of noise-reducing means or methods.

Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.

The LAMC also contains provisions that would regulate the project's operational noise impacts. Shown below, Sec.112.01 would prohibit amplified noises, especially those from outdoor sources (e.g., speakers, stereo systems), from exceeding the ambient noise levels of adjacent properties by more than 5 dBA. Amplified noises would also be prohibited from being audible at any distance greater than 150 feet from the project's property line.

SEC.112.01. RADIOS, TELEVISION SETS, AND SIMILAR DEVICES

(a) It shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area.

(b) Any noise level caused by such use or operation which is audible to the human ear at a distance in excess of 150 feet from the property line of the noise source, within any residential zone of the City or within 500 feet thereof, shall be a violation of the provisions of this section.

(c) Any noise level caused by such use or operation which exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than five (5) decibels shall be a violation of the provisions of this section.

Sec.112.02(a), below, would prevent project HVAC systems from elevating ambient noise levels at neighboring residences by more than 5 dBA.

SEC.112.02. AIR CONDITIONING, REFRIGERATION, HEATING, PLUMBING, FILTERING EQUIPMENT

(a) It shall be unlawful for any person, within any zone of the city, to operate any air conditioning, refrigeration or heating equipment for any residence or other structure or to operate any pumping, filtering or heating equipment for any pool or reservoir in such manner as to create any noise which would cause the noise level on the premises of any other occupied property … to exceed the ambient noise level by more than five decibels.

Vibration Regulatory Setting

Federal

The FTA has published guidelines for assessing the impacts of ground borne vibration associated with construction activities, which have been applied by other jurisdictions to other types of projects. According to FTA guidelines, the vibration threshold of architectural damage for non-engineered timber and mason buildings (e.g., residential units) is 0.2 in/sec PPV and 0.5 in/sec PPV for reinforced concrete, steel, or timber buildings. For institutional land uses such as schools, churches, and offices experiencing occasional events of ground-borne vibration or noise from transient sources, the FTA has established a threshold of 78 VdB.[99] For recording and TV studio land uses, the threshold is 65 VdB for all events.[100] There are no FHWA standards for traffic-related vibrations.[101] The vibration threshold of perception is 0.01 inch/second PPV, which is approximately equal to 94 vibration decibels (VdB).[102] The FTA has also set standards that address

99 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.

100 Ibid.

101 US Department of Transportation, Federal Transit Administration, Office of Planning and Environment, Transit and Vibration Impact Assessment, FTA-VA-90-1003-06, May 2006.

102 Federal Transit Administration, Office of Planning and Environment, Transit Noise and Vibration Impact Assessment, FTA-VA-90-1003-06, 2006, 12-13.

the effect of long-term vibration on human annoyance. Ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that may affect concentration or disturb sleep.

Table IV-14 summarizes FTA vibration thresholds for land use disruption from vibration impacts.

Table IV-14
Land Use Disruption Vibration Thresholds

Building Category	Significance Thresholds (VdB)		
	Frequent Events	Occasional Events	Infrequent Events
Buildings where vibration would interfere with interior operations.	65	65	65
Residences and buildings where people normally sleep.	72	75	80
Institutional land uses with primarily daytime use	75	78	83
Concert halls, TV studios, and recording studios	65	65	65
Auditoriums and theaters	72	80	80

Source: FTA, 2006.

State

To counter the effects of ground-borne vibration, the California Department of Transportation (Caltrans) has published guidance relating to structural vibration impacts, as well as human annoyance impacts. According to Caltrans, modern industrial/commercial buildings and new residential structures can be exposed to continuous ground-borne vibration levels of 0.5 inches per second without experiencing structural damage.[103]

Table IV-18, Building Damage Vibration Thresholds (PPV), summarizes Caltrans' vibration thresholds for building and structural damage.

[103] California Department of Transportation. Transportation and Construction Vibration Guidance Manual, September 2013.

Table IV-18 Building Damage Vibration Thresholds (PPV)		
Structure and Condition	**Significance Thresholds (in/sec PPV)**	
	Transient Sources	**Continuous/Frequent/ Intermittent Sources**
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5
Source: California Department of Transportation, 2013.		

Table IV-19, Human Annoyance Vibration Thresholds, summarizes Caltrans' vibration thresholds for human annoyance.

Table IV-19 Human Annoyance Vibration Thresholds (PPV)		
Human Response	**Significance Thresholds (in/sec PPV)**	
	Transient Sources	**Continuous/Frequent/ Intermittent Sources**
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.9	0.1
Severe	2.0	0.4
Source: California Department of Transportation, 2013.		

<u>City</u>

In terms of construction-related impacts on buildings, the City of Los Angeles has not adopted policies or guidelines relative to groundborne vibration. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as both the City of Los Angeles and the County of Los Angeles do not have a significance threshold to assess vibration impacts during construction, Caltrans' adopted vibration standards for buildings are used to evaluate potentially damaging structural impacts related to project construction.

According to Appendix G of the State CEQA Guidelines, the impacts of a Proposed Project related to Noise would be considered significant if the project would result in:

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

Less Than Significant Impact. A significant construction impact may occur where a project would not comply with the City of Los Angeles General Plan Land Use Compatibility Standards for Noise or the City of LAMC (Municipal Code Ordinance No. 41.40 and 112.05) or exceed the L.A. CEQA Thresholds Guide criteria. The City of Los Angeles has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise-sensitive land uses.

Construction Noise Impacts

On-Site Construction Activity

During demolition, grading, construction, and other project phases, noise-generating activities could occur at the Project Site between the hours of 7:00 a.m. and 9:00 p.m. Monday through Friday, in accordance with Sec.41.40 of the LAMC. Land uses surrounding the Project Site include single- and multi-family residences, park, education, and commercial land-uses. The nearest sensitive receptors to the Proposed Project are shown in **Figure IV-2 Sensitive Receptors**, and described below:

- Single family residences along Sanford Street located approximately 340 feet to the northeast of the Project Site;
- Ballona Preserve located approximately 370 feet to the west of the Project Site;
- Westside Neighborhood School located approximately 430 feet to the south of the Project Site;
- Single -family residences along McConnell Street/Milton Street located approximately 650 feet to the north of the Project Site;
- Animo Westside Charter Middle School located approximately 1,300 feet to the southeast of the Project Site.

On April 12, 2017, short-term, 15-minute noise readings were conducted at these receptors to ascertain their current ambient noise levels.[104] Ambient noise levels were primarily a product of vehicular travel along Jefferson Boulevard and SR-90. As shown in **Table IV-21**, **Construction Noise Level – Unmitigated**, the ambient noise levels were between 60.4 and 69.2 dBA L_{eq}.

Construction activity would result in temporary increases in ambient noise levels in the project area on an intermittent basis. Construction of the Proposed Project would generate noise from a variety of on- and off-site activities, and would include the use of on-site heavy equipment such as bulldozers, as well as smaller equipment such as saws, hammers, and pneumatic tools. Secondary noise could also be generated by construction worker vehicles and vendor deliveries. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers. Typical sound levels associated with construction equipment are shown in **Table IV-20, Maximum Noise Levels Generated by Typical Construction Equipment, L_{max}.** For this analysis, construction noise impacts were modeled using the noise reference level for a grader, which can produce average peak noise levels of 85 dBA at a reference distance of 50 feet.[105] Because graders and other similar tractor-type vehicles are expected to be the loudest and most extensively used pieces of heavy equipment during construction of the Proposed Project, this analysis examines a "worst-case-scenario"; the noise impacts of all other construction activities would not exceed those analyzed here.

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104 Noise measurements were taken using a Larson Davis 820 Sound Level Meter. This meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental noise measurement instrumentation. The meter was equipped with an omni-directional microphone, and positioned at approximately five feet above the ground. Noise monitoring data is included as Appendix C to this Initial Study.

105 Federal Highway Administration, Highway Construction Noise Handbook, 2006.

Table IV-20 Maximum Noise Levels Generated by Typical Construction Equipment, L_{max}	
Type of Equipment	**Actual Measured Noise Level (dBA at 50 feet)**
Air Compressor	78
Backhoe	78
Concrete Mixer Truck	79
Crane	81
Dozer	82
Generator	81
Grader	85[a]
Paver	77
Pump	81
Roller	80
Tractor	84[a]
Welder	74

Sources: FHWA, Highway Construction Noise Handbook, 2006.
a. FHWA does not have data on actual measured noise levels, therefore FHWA provides a specification limit for maximum noise emitted.

As shown in **Table IV-21**, C**onstruction Noise Level – Unmitigated,** the nearest residences are projected to experience noise levels of 64.8 dBA, an increase of 2.9 dBA. The maximum sound level increase of 3.3 dBA would occur at the Ballona Preserve. These sound levels are within the 5 dBA noise increase threshold considered to be a significant impact by the L.A. CEQA Thresholds Guide for construction activities lasting more than ten days in a three month period. Additionally, the project's construction noise levels would not exceed LAMC Sec.112.05's 75 dBA limit for powered construction equipment within 500 feet of residential zones. Furthermore, the Project Applicant shall adhere to Ordinance No. 178048, which would notify sensitive receptors of future construction activities as detailed in **Regulatory Compliance Measure RCM-NOI-1**. Because construction noise impacts would not exceed City thresholds for construction noise, these on-site construction-related noise impacts would be less than significant.

Table IV-21 Construction Noise Level - Unmitigated					
Sensitive Receptor	**Distance from Site (feet)**	**Maximum Construction Noise Level (dBA)**	**Existing Ambient (dBA, L_{eq})**	**New Ambient (dBA, L_{eq})**	**Increase**
Residences along Sanford	340	62.3	62.6	65.5	2.9
Ballona Preserve	370	61.6	61.1	64.4	3.3
Westside Neighborhood School	430	60.3	60.4	63.4	3.0
Residences along McConnell/Milton Street	650	56.7	61.1	62.5	1.4
Animo Westside Charter Middle School	1,300	50.7	69.2	69.3	0.1
Source: Impact Sciences, 2017.					

Off-Site Construction Haul Truck Activity

With regard to off-site construction-related noise impacts, site preparation and grading activities would necessitate up to approximately 135 haul trips per work day over the course of two months to export excavated soils and materials. While this vehicle activity would increase ambient noise levels along the haul route, ambient noise levels would not be expected to significantly increase ambient noise levels by 5 dBA or greater at any noise sensitive land use. According to the L.A. CEQA Thresholds Guide, a 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speeds and fleet mix remain constant. Though the addition of haul trucks would alter the fleet mix of the anticipated haul route, their addition to local roadways would not nearly double those roads' traffic volumes, let alone increase their traffic to levels capable of producing 5 dBA ambient noise increases. However, trucks accessing the proposed project site, while not significantly increasing ambient noise levels, have the potential to instantaneously increase noise levels as each truck passes nearby sensitive receptors. These temporary instantaneous noise level increases may reach a maximum range of approximately 76 to 88 dBA at 50 feet from the source.[106,107] Best Management Practices (BMPs) can be used to reduce disruption to nearby sensitive receptors. BMPs are a group of "good neighbor" policies that the applicant has volunteered to implement as part of the project. As a

[106] Ibid.

[107] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment.* May 2006.

result, off-site construction noise impacts related to haul trips would be considered **less than significant**.

Best Management Practices

Trucks, including construction haul trucks and construction equipment and material delivery vehicles, shall avoid accessing residential streets, schools, and other sensitive receptors identified above to the maximum extent feasible. Contract specifications shall be included in the proposed Project construction documents, including haul truck destinations and routes, which shall be reviewed by the City prior to land use clearance.

Trucks, including construction haul trucks and construction equipment and material delivery vehicles, shall maintain a distance of no less than 50 feet from residences, schools, and other sensitive receptors identified above. Contract specifications shall be included in the proposed Project construction documents, including haul truck destinations and routes, which shall be reviewed by the City prior to land use clearance.

The project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

The Applicant and its contractors and subcontractors shall ensure that construction equipment is properly muffled according to manufacturer's specifications or as required by the City, whichever is the more stringent.

The Applicant and its contractors and subcontractors shall place noise-generating construction equipment and locate construction staging areas away from noise-sensitive activities, where feasible, to the satisfaction of the City.

The Applicant and its contractors and subcontractors shall implement noise attenuation measures which may include, but are not limited to, noise barriers or noise blankets to the satisfaction of the City.

Construction plans shall identify BMPs to be implemented during construction. All construction workers shall be briefed at a pre-construction meeting on how, why, and where BMP measures are to be implemented. BMPs shall be adhered to for the duration of the Project***Operational Noise Impacts***

HVAC Systems

The HVAC system that would be installed for the Proposed Project would typically result in noise levels that average between 40 and 50 dBA L_{eq} at 50 feet from the equipment. As discussed previously, CNELs for constant noise sources are about 6.7 dBA greater than 24-hour L_{eq} measurements. As such, the HVAC equipment associated with the Proposed Project could generate noise levels that average from 47 to 57 dBA CNEL at 50 feet from the source when the equipment is operating continuously over a 24-hour period. However, as part of the Proposed Project, these HVAC units would be mounted on the rooftop of the proposed building and would be screened from view by parapets and/or walls, as well as being provided with proper shielding to reduce noise levels. The shielding that would be installed around these systems would typically reduce noise levels by approximately 15 dBA. Thus, the noise levels from these HVAC systems could be reduced to between approximately 32 to 42 dBA L_{eq} at 50 feet from the equipment, which would result in noise levels of approximately 38.7 to 48.7 dBA CNEL. These noise levels would not exceed the City's exterior noise level standard of 65 dBA CNEL for multi-family residences and 70 dBA CNEL for schools, and would also comply with Section 112.02 of the LAMC (**RCM-NOI-3**), which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on adjacent properties by more than 5 dBA. Therefore, this impact would be less than significant. No further analysis is required.

Parking Facilities

It is anticipated that sources of noise from the parking facilities would include tires squealing, engines accelerating, doors slamming, and car alarms. Noise levels at the parking facilities would fluctuate with the amount of automobile and human activity at the site. During times when the largest number of people would enter and exit the Project Site, the noise levels would range from 60 to 70 dBA L_{eq}. There would also be times in the day when very little activity occurs and the noise levels average 50 to 60 dBA L_{eq}.

On-site noise, however, contained within the subterranean parking structure on the Project Site. Parking noise would not be anticipated to be perceptible at off-site sensitive receptors. Thus, impacts associated with noise generated as a result of parking activity at the Proposed Project

would not adversely affect the sensitive receptors adjacent to the Project Site, and this impact would be less than significant. No further analysis is required.

Land Use Compatibility

The project would locate new noise-sensitive receptors at the Project Site. The ambient noise level at the Project Sites is not expected to be higher than any of the existing adjacent residential land uses in the immediate project vicinity due to the similarity in geography and noise sources. Because the new multi-family residences will be sited in a similar geographic area, with similar noise sources, to existing low density single- and multi-family residences, the project is considered to be located in a compatible noise environment. Furthermore, the Project Applicant shall adhere to California Code of Regulations, Title 24 (**RCM-NOI-2**), which states that interior noise levels attributable to exterior sources shall not exceed 45 dBA CNEL in any habitable room of new multi-family dwellings **.**As a result, this impact would be considered less than significant.

Regulatory Compliance Measures

RCM-NOI-1 The project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

RCM-NOI-2 The project shall comply with the California Code of Regulations, Title 24, requiring new multi-family dwellings to have an interior noise level not exceeding 45 dBA CNEL.

RCM-NOI-3 LAMC Section 112.02 requires that any heating, ventilation, and air conditioning (HVAC) system within any zone of the City not cause an increase in ambient noise levels on any other occupied property or if a condominium, apartment house, duplex, or attached business, within any adjoining unit to exceed the ambient noise level by more than 5 dBA.

Traffic Noise

The majority of the project's operational noise impacts would be from indirect mobile noise impacts associated with new daily vehicle trips.[108] The impact of this additional traffic on ambient noise levels in the project's vicinity was modeled with FHWA TNM 2.5, comparing an existing year no project scenario to an existing year with project scenario. As shown in **Table IV-22, Existing and Future A.M. Peak Hour Mobile Source Noise Levels** and **Table IV-23**, **Existing and Future P.M. Peak Hour Mobile Source Noise Levels,** the largest ambient noise level increase as a result of project traffic would be 0.6 dBA, occurring on Beethoven Street during the P.M. peak hour. This increase in ambient noise would be far below the threshold of audibility and would not cause ambient noise levels measured at the property lines of affected land uses to rise by 3 dBA to or within their respective "normally unacceptable" or "clearly unacceptable" categories as defined by the 2003 California General Plan Guidelines. At all other roadway segments, project-related mobile noise increases would have an even lesser impact. As a result, the project's off-site vehicular noise impacts would be considered less than significant. No further analysis is necessary.

108 KOA Corporation, Traffic Impact Study for Del Rey Pointe Los Angeles, California, March 2017.

Table IV-22 Existing and Future A.M. Peak Hour Mobile Source Noise Levels				
	Estimated dBA, L_{eq} 1hr			
Roadway Segment	**Existing No Project**	**Existing Plus Project**	**Project Change**	**Significant Impact?**
Jefferson Boulevard from Lincoln Boulevard to Alla Road	67.9	68.0	0.1	**No**
Jefferson Boulevard from Alla Road to Beethoven Street	68.5	68.6	0.1	**No**
Jefferson Boulevard from Beethoven Street to McConnell Avenue	67.4	67.5	0.1	**No**
Jefferson Boulevard from McConnell Avenue to Centinela Avenue	69.0	69.1	0.1	**No**
Jefferson Boulevard from Centinela Avenue to Inglewood Boulevard	68.7	68.8	0.1	**No**
Jefferson Boulevard from Inglewood Boulevard to I-405	68.1	68.2	0.1	**No**
Lincoln Boulevard North of Jefferson Boulevard	68.9	68.9	0.0	**No**
Pacific Coast Highway South of Jefferson Boulevard	68.4	68.5	0.1	**No**
Beethoven Street North of Jefferson	56.6	57.0	0.4	**No**
Centinela Avenue from Jefferson Boulevard to State Route 90	64.1	64.1	0.0	**No**
Inglewood Boulevard from Jefferson Boulevard to State Route 90	65.6	65.6	0.0	**No**
Source: Impact Sciences, 2017.				

Table IV-23 Existing and Future P.M. Peak Hour Mobile Source Noise Levels				
	Estimated dBA, L_{eq} 1hr			
Roadway Segment	**Existing No Project**	**Existing Plus Project**	**Project Change**	**Significant Impact?**
Jefferson Boulevard from Lincoln Boulevard to Alla Road	68.5	68.6	0.1	**No**
Jefferson Boulevard from Alla Road to Beethoven Street	68.8	68.9	0.1	**No**
Jefferson Boulevard from Beethoven Street to McConnell Avenue	68.5	68.6	0.1	**No**
Jefferson Boulevard from McConnell Avenue to Centinela Avenue	68.7	68.9	0.2	**No**
Jefferson Boulevard from Centinela Avenue to Inglewood Boulevard	68.8	68.9	0.1	**No**
Jefferson Boulevard from Inglewood Boulevard to I-405	68.1	68.2	0.1	**No**
Lincoln Boulevard North of Jefferson Boulevard	68.7	68.8	0.1	**No**
Pacific Coast Highway South of Jefferson Boulevard	68.6	68.6	0.0	**No**
Beethoven Street North of Jefferson	57.2	57.8	0.6	**No**
Centinela Avenue from Jefferson Boulevard to State Route 90	63.9	63.9	0.0	**No**
Inglewood Boulevard from Jefferson Boulevard to State Route 90	65.6	65.6	0.0	**No**
Source: Impact Sciences, 2017.				

The project shall comply with the City of Los Angeles General Plan Noise Element and Ordinance No. 161,574, which prohibits the emission of creation of noise beyond certain levels at adjacent uses unless technically infeasible. Therefore, the noise exposure impact would be less than significant

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

Less Than Significant Impact. A significant impact may occur if a project were to generate excessive vibration during construction or operation. Construction activities can generate varying degrees of vibration, depending on the construction procedures and the type of construction

equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source.

Construction Vibration Impacts

Ground-borne vibration would be generated by a number of on-site construction activities. **Table IV-24, Vibration Source Levels for Commonly Used Construction Equipment (PPV)**, shows vibration levels associated with various construction equipment.

Table IV-24
Vibration Source Levels for Commonly Used Construction Equipment (PPV)

Human Response	Approximate PPV (in/sec) at 25 Feet At 25 Feet	Approximate RMS (VdB) at 25 Feet
Large Bulldozer	0.089	87
Caisson Drilling	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Source: California Department of Transportation, 2013.

Ground-borne vibration would be primarily generated by a number of on-site construction activities. As a result of construction activity generating up to 0.089 inches per second PPV (87 VdB), vibration velocities of up to 0.002 inches per second PPV (53 VdB) could occur at the nearest off-site structures (**Table IV-25, Building Damage Vibration Levels At Off-Site Structures - Unmitigated** and **Table IV-26 Human Annoyance Vibration Levels At Off-Site Structures - Unmitigated,**). This vibration intensity is below the 0.2 inches per second PPV building damage threshold, the 0.04 inches per second human annoyance threshold, and below the 80 VdB land use disruption threshold (**Table IV-27, Land Use Interference - Unmitigated**). More distant receptors would experience even lower vibration levels.

Given that other construction equipment and activities would produce less vibration and have reduced impacts on nearby receptors, construction-related structural vibration impacts would be considered less than significant. Unless heavy construction activities are conducted extremely close (within a few feet) to neighboring structures, vibrations from construction activities rarely reach the levels that damage structures. There are no neighboring structures that would be damaged by construction vibration. No further analysis is required.

Table IV-25 Building Damage Vibration Levels At Off-Site Structures - Unmitigated				
Off-Site Structures	**Distance to Project Site (ft.)**	**Estimated PPV (in/sec)**	**FTA Structural Significance Threshold (in/sec)**	**Significant?**
Single family residences along Sanford Street	340	0.002	0.2	**No**
Ballona Preserve	370	0.002	0.5	**No**
Westside Neighborhood School	430	0.001	0.5	**No**
Single-family residences along McConnell Street/Milton Street	650	0.001	0.2	**No**
Multi-family residences along McConnell Street	870	<0.001	0.2	**No**
Animo Westside Charter Middle School	1,300	<0.001	0.5	**No**
Source: Impact Sciences, 2017.				

Table IV-26 Human Annoyance Vibration Levels At Off-Site Structures - Unmitigated				
Off-Site Receptors	**Distance to Project Site (ft.)**	**Estimated PPV (in/sec)**	**Caltrans Annoyance Significance Threshold (in/sec)**	**Significant?**
Single family residences along Sanford Street	340	0.002	0.04	**No**
Ballona Preserve	370	0.002	0.04	**No**
Westside Neighborhood School	430	0.001	0.04	**No**
Single-family residences along McConnell Street/Milton Street	650	0.001	0.04	**No**
Multi-family residences along McConnell Street	870	<0.001	0.04	**No**
Animo Westside Charter Middle School	1,300	<0.001	0.04	**No**
Source: Impact Sciences, 2017.				

Table IV-27 Land Use Interference - Unmitigated				
Off-Site Structures	**Distance to Project Site (ft.)**	**Estimated VdB**	**FTA Land-Use Interference Threshold (VdB)**	**Significant?**
Single family residences along Sanford Street	340	53	80	**No**
Ballona Preserve	370	52	83	**No**
Westside Neighborhood School	430	50	83	**No**
Single-family residences along McConnell Street/Milton Street	650	45	80	**No**
Multi-family residences along McConnell Street	870	41	80	**No**
Animo Westside Charter Middle School	1,300	36	83	**No**
Source: Impact Sciences, 2017.				

Operations Vibration Impacts

During operations of the Proposed Project, there would be no significant stationary sources of ground-borne vibration, such as heavy equipment or industrial operations. Operational ground-borne vibration in the project vicinity would be generated by vehicular travel on local roadways. However, road vehicles rarely create enough ground-borne vibration to be perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. Project-related traffic would expose nearby land uses and other sensitive receptors to vibration levels far below levels associated with land use disruption, and would as a result be considered less than significant. No further analysis is required.

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

Less Than Significant Impact. A significant impact may occur if a project would introduce substantial new sources of noise or would substantially add to existing sources of noise within the vicinity of the Project Site during the operation of the project. New stationary sources of noise, such as rooftop mechanical HVAC equipment, would be installed on the proposed development. The design of the equipment will be required to comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five dBA. With implementation of the regulations that address rooftop mechanical

equipment, a substantial permanent increase for nearby sensitive receptors would be reduced to a less than significant level.

Table IV-28, A.M. Peak Hour Cumulative Mobile Source Noise Levels, Existing Conditions and Future Plus Project and **Table IV-29, A.M. Peak Hour Cumulative Mobile Source Noise Levels, Future No Project and Future Plus Project** show the cumulative A.M. peak hour future plus project noise level increases as compared to existing conditions, and cumulative A.M. peak hour future plus project noise level increases compared to future scenario without project. As shown in **Tables IV-22,** and **IV-23**, the largest ambient noise level increase as a result of project traffic would be 1.6 dBA, occurring on Jefferson Boulevard between Beethoven Street and McConnell Avenue during the A.M. peak hour. This increase in ambient noise would be far below the threshold of audibility and would not cause ambient noise levels measured at the property lines of affected land uses to rise by 3 dBA to or within their respective "normally unacceptable" or "clearly unacceptable" categories as defined by the 2003 California General Plan Guidelines. At all other roadway segments, project-related mobile noise increases would have an even lesser impact. As a result, the project's off-site vehicular noise impacts would be considered less than significant.

Table IV-30, P.M. Peak Hour Cumulative Mobile Source Noise Levels, Existing Conditions and Future Plus Project and **Table IV-31, P.M. Peak Hour Cumulative Mobile Source Noise Levels, Future No Project and Future Plus Project** show the cumulative P.M. peak hour future plus project noise level increases as compared to existing conditions, and cumulative P.M. peak hour future plus project noise level increases compared to future scenario without project. As shown in **Tables IV-22,** and **IV-23**, the largest ambient noise level increase as a result of project traffic would be 1.2 dBA, occurring on Beethoven Street during the P.M. peak hour. This increase in ambient noise would be far below the threshold of audibility and would not cause ambient noise levels measured at the property lines of affected land uses to rise by 3 dBA to or within their respective "normally unacceptable" or "clearly unacceptable" categories as defined by the 2003 California General Plan Guidelines. At all other roadway segments, project-related mobile noise increases would have an even lesser impact. As a result, the project's off-site vehicular noise impacts would be considered less than significant. No further analysis is necessary.

Table IV-28 A.M. Peak Hour Cumulative Mobile Source Noise Levels				
	Estimated dBA, L_{eq} 1hr			
Roadway Segment	**Existing Conditions**	**Future Plus Project**	**Project Change**	**Significant Impact?**
Jefferson Boulevard from Lincoln Boulevard to Alla Road	67.9	68.6	0.7	**No**
Jefferson Boulevard from Alla Road to Beethoven Street	68.5	69.2	0.7	**No**
Jefferson Boulevard from Beethoven Street to McConnell Avenue	67.4	69	1.6	**No**
Jefferson Boulevard from McConnell Avenue to Centinela Avenue	69	69.6	0.6	**No**
Jefferson Boulevard from Centinela Avenue to Inglewood Boulevard	68.7	69.3	0.6	**No**
Jefferson Boulevard from Inglewood Boulevard to I-405	68.1	68.8	0.7	**No**
Lincoln Boulevard North of Jefferson Boulevard	68.9	69.1	0.2	**No**
Pacific Coast Highway South of Jefferson Boulevard	68.4	68.7	0.3	**No**
Beethoven Street North of Jefferson	56.6	57.8	1.2	**No**
Centinela Avenue from Jefferson Boulevard to State Route 90	64.1	64.6	0.5	**No**
Inglewood Boulevard from Jefferson Boulevard to State Route 90	65.6	66.1	0.5	**No**
Source: Impact Sciences, 2017.				

Table IV-29 A.M. Peak Hour Cumulative Mobile Source Noise Levels				
	Estimated dBA, L_{eq} 1hr			
Roadway Segment	**Future No Project**	**Future Plus Project**	**Project Change**	**Significant Impact?**
Jefferson Boulevard from Lincoln Boulevard to Alla Road	68.6	68.6	0.0	**No**
Jefferson Boulevard from Alla Road to Beethoven Street	69.1	69.2	0.1	**No**
Jefferson Boulevard from Beethoven Street to McConnell Avenue	68.9	69	0.1	**No**
Jefferson Boulevard from McConnell Avenue to Centinela Avenue	69.5	69.6	0.1	**No**
Jefferson Boulevard from Centinela Avenue to Inglewood Boulevard	69.3	69.3	0.0	**No**
Jefferson Boulevard from Inglewood Boulevard to I-405	68.8	68.8	0.0	**No**
Lincoln Boulevard North of Jefferson Boulevard	69.1	69.1	0.0	**No**
Pacific Coast Highway South of Jefferson Boulevard	68.7	68.7	0.0	**No**
Beethoven Street North of Jefferson	57.5	57.8	0.3	**No**
Centinela Avenue from Jefferson Boulevard to State Route 90	64.6	64.6	0.0	**No**
Inglewood Boulevard from Jefferson Boulevard to State Route 90	66	66.1	0.1	**No**
Source: Impact Sciences, 2017.				

Table IV-30 P.M. Peak Hour Cumulative Mobile Source Noise Levels				
	Estimated dBA, L_{eq} 1hr			
Roadway Segment	**Existing Conditions**	**Future Plus Project**	**Project Change**	**Significant Impact?**
Jefferson Boulevard from Lincoln Boulevard to Alla Road	68.5	69.3	0.8	**No**
Jefferson Boulevard from Alla Road to Beethoven Street	68.8	69.5	0.7	**No**
Jefferson Boulevard from Beethoven Street to McConnell Avenue	68.5	69.1	0.6	**No**
Jefferson Boulevard from McConnell Avenue to Centinela Avenue	68.7	69.4	0.7	**No**
Jefferson Boulevard from Centinela Avenue to Inglewood Boulevard	68.8	69.6	0.8	**No**
Jefferson Boulevard from Inglewood Boulevard to I-405	68.1	69.0	0.9	**No**
Lincoln Boulevard North of Jefferson Boulevard	68.7	69.0	0.3	**No**
Pacific Coast Highway South of Jefferson Boulevard	68.6	68.8	0.2	**No**
Beethoven Street North of Jefferson	57.2	58.4	1.2	**No**
Centinela Avenue from Jefferson Boulevard to State Route 90	63.9	64.6	0.7	**No**
Inglewood Boulevard from Jefferson Boulevard to State Route 90	65.6	66.1	0.5	**No**
Source: Impact Sciences, 2017.				

Table IV-31 P.M. Peak Hour Cumulative Mobile Source Noise Levels				
	Estimated dBA, L_{eq} 1hr			
Roadway Segment	**Future No Project**	**Future Plus Project**	**Project Change**	**Significant Impact?**
Jefferson Boulevard from Lincoln Boulevard to Alla Road	69.2	69.3	0.1	**No**
Jefferson Boulevard from Alla Road to Beethoven Street	69.4	69.5	0.1	**No**
Jefferson Boulevard from Beethoven Street to McConnell Avenue	69	69.1	0.1	**No**
Jefferson Boulevard from McConnell Avenue to Centinela Avenue	69.3	69.4	0.1	**No**
Jefferson Boulevard from Centinela Avenue to Inglewood Boulevard	69.5	69.6	0.1	**No**
Jefferson Boulevard from Inglewood Boulevard to I-405	68.9	69.0	0.1	**No**
Lincoln Boulevard North of Jefferson Boulevard	69.0	69.0	0.0	**No**
Pacific Coast Highway South of Jefferson Boulevard	68.8	68.8	0.0	**No**
Beethoven Street North of Jefferson	58.0	58.4	0.4	**No**
Centinela Avenue from Jefferson Boulevard to State Route 90	64.5	64.6	0.1	**No**
Inglewood Boulevard from Jefferson Boulevard to State Route 90	66.1	66.1	0.0	**No**
Source: Impact Sciences, 2017.				

The majority of any long-term noise impacts would come from traffic traveling to and from the Proposed Project site. This, the addition of future traffic from any new developments in the project area, and overall ambient traffic growth would elevate ambient noise levels along local roadways. However, as shown above in **Tables IV-28, IV-29**, **IV-30**, and **IV-31**, the project's contribution to permanent off-site ambient noise levels would be minimal. Given that this additional traffic would not contribute to off-site ambient noise increases of greater than 1.6 dBA, the project's individual and cumulative mobile source noise impacts would be considered less than significant. No further analysis is required.

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project were to result in a substantial temporary or periodic increase in ambient noise levels above existing ambient noise levels without the Proposed Project.

As discussed earlier, construction activities would temporarily increase ambient noise levels at nearby receptors. However, as shown in **Table IV-21, Construction Noise Level - Unmitigated** above, construction noise levels would not exceed City thresholds. The project's construction noise impacts would be considered less than significant. No further analysis is required.

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

No Impact. A significant impact would occur if the proposed project would expose people residing or working in the project area to excessive noise levels from a public airport or public use airport. Based upon the criteria established in the City of Los Angeles *Draft L.A. CEQA Thresholds Guide*, a significant impact on ambient noise levels would normally occur if noise levels at a noise sensitive use attributable to airport operations exceed 65 dBA CNEL and the project increases ambient noise levels by 1.5 dBA CNEL or greater.

The Project Site is approximately 2.0 miles north of the LAX airport. The project site is outside of the Los Angeles International Airport Land Use Plan. The LAX 65 dBA CNEL noise contour does not extend north past Manchester Boulevard, which is approximately 7,000 feet to the south of the Project Site.[109] Additionally, the Project Site is also north of the 60 dBA CNEL contour.[110] Due to the distance, noise sensitive receptors would not be exposed to ambient noise levels over 65 dBA CNEL

The Project Site is outside of noise contours for LAX which would increase sound levels at nearby sensitive receptors to exceed land use compatibility thresholds. Accordingly, the proposed project would not expose people working or residing in the project area to excessive noise levels from a public airport or public use airport. Therefore, no impact would occur. No further analysis is required.

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109 *Los Angeles International Airport,* LAX Master Plan Final EIS/EIR, Figure F4.1-6, *April, 2004.*

110 Ibid. Figure F4.1-1.

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

No Impact. A significant impact would occur if the proposed project would expose people residing or working in the project area to excessive noise levels from a private airstrip. Based upon the criteria established in the City of Los Angeles *Draft L.A. CEQA Thresholds Guide*, a significant impact on ambient noise levels would normally occur if noise levels at a noise sensitive use attributable to airport operations exceed 65 dBA CNEL and the project increases ambient noise levels by 1.5 dBA CNEL or greater. This question would apply to a project only if the Project Site were in the vicinity of a private airstrip and would subject area residents and workers to substantial noise levels from aircraft operations.

The Project Site is not located within the vicinity of a private airstrip. Accordingly, the proposed project would not expose people working or residing in the project area to excessive noise levels from a private airstrip. No impact would occur. No further analysis is required.

13. POPULATION AND HOUSING

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)?

Less than significant impact. A potentially significant impact would occur if the proposed project would induce substantial population growth that would not have otherwise occurred as rapidly or in as great a magnitude. As previously discussed, the Project Site is located within the jurisdiction of SCAG, SCAG's mandated responsibilities include development plans and policies with respect to the region's population growth transportation programs, air quality, housing, and economic development. Specifically, SCAG is responsible for preparing the Regional Comprehensive Plan (RCP), the Regional Transportation Plan (RTP) and the Regional Housing Needs Assessment (RHNA), in coordination with other population employment, and housing projections for the regions and its subdivisions. In April 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan / Sustainable Community Strategy (2016 RTP/SCS). The 2016 RTP/SCS presents the transportation vision for the region through the year 2040 and provides a long-term investment framework for addressing the region's transportation and related challenges. It also includes projects of population, households, and employment through the horizon year.

The Proposed Project is a 6-story residential development, consisting, 236 residential units, a variety of community serving uses, recreation/open space areas, and 430 parking spaces. The project requires a General Plan Amendment and Vesting Zone Change from [T][Q]M2-1 (Light Industrial) to [T][Q]R4-1 (High Medium Residential). The existing M2-1 zone does not allow any building containing dwelling units or guest rooms. The proposed R4-1 zone would allow residential development at a rate of 1 dwelling unit per 400 square feet of lot area, for a maximum of 303 dwelling units on the 121,493 square-foot site. Therefore, the proposed General Plan Amendment and Vesting Zone Change does constitute a substantial increase in permitted density on the subject site. The project also requires the extension of roads and infrastructure to serve the subject site, including a bridge for vehicular access through the form of a private driveway from an adjacent property, and sewer and storm drain lines.

The Project would introduce new residential units and employment opportunities. According to SCAG's Profile of the City of Los Angeles (2016)[111], the City's average household size was 2.9 in

[111] Southern California Association of Governments' (SCAG) Profile of the City of Los Angeles, website: https://www.scag.ca.gov/Documents/LosAngeles.pdf, accessed March 12, 2018.

2016. The Proposed Project is estimated to generate approximately 685 residents based on SCAG's average household size. According to SCAG, the City had a population of 4,040,904 in 2016, and is expected to increase to 4,221,659 people by 2020.[112] While the Project increases the permitted density on the site, the increase in residential population resulting from the Proposed Project would not be considered substantial in consideration of anticipated growth for the City, representing approximately 0.38 percent of the anticipated growth. Therefore, the Proposed Project would not directly induce substantial population growth in the project area, and impacts would be less than significant. The physical secondary or indirect impacts of population growth such as increased traffic or noise have been adequately mitigated in other portions of this document. No further analysis is necessary.

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

No Impact. A potentially significant impact would occur if the proposed project would displace a substantial quantity of existing residences or a substantial number of people. No housing exists on the Project Site. The site is currently vacant, paved, and fenced. The Proposed Project would not result in the displacement of existing housing or displace a substantial number of people resulting in the construction of replacement housing elsewhere. The project will provide 236 new residential units. No impacts would occur, and no further analysis is required.

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

No Impact. See response to **Section 13(b)**, above. No further analysis is required.

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112 Using a 1.1 percent annual growth factor, as utilized by the California Department of Finance, E-1 Population Estimates for Cities, Counties, and the State, website: http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-1/documents/E-1_2017_InternetVersion.xls, accessed March 12, 2018.

14. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

a) Fire protection?

Less Than Significant Impact. A project would normally have a significant impact on fire protection if it requires the addition of a new or physically altered fire station (including the expansion, consolidation or relocation of an existing facility to maintain service). The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance and has the minimum fire flow required for the land use proposed. Pursuant to Section 507.3.3, Table 507.3.3, of the 2014 City of Los Angeles Fire Code, the maximum response distance between high density residential land uses and a LAFD fire station that houses an engine company or truck company is 1.5 miles or 2 miles, respectively. Minimum fire flow requirement for high-density residential land uses is 4,000 gallons per minute (gpm) from four adjacent hydrants flowing simultaneously.[113] If either of these distances were exceeded, all structures located in the applicable residential buildings would be required to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the project were located beyond the maximum response distance. The Project Site is located within the West Bureau, Battalion 4 of the LAFD. The Proposed Project site would be served by the LAFD Station No. 67, located at 5451 Playa Vista Drive, approximately 0.8 miles southwest of the site. Fire Station 67 is equipped with one truck and three medic response vehicles, and has operational response time of 7 minutes 14 seconds for EMS and 6 minutes 35 seconds for non-EMS[114].

The Proposed Project would increase the intensity of development on the site by adding new residential uses. The new 236 residential units, anticipated to generate up to approximately 685 residents, would be expected to increase the demand on existing fire protection and emergency services. To maintain the level of fire protection and emergency services, the LAFD may require additional fire personnel and equipment. However, given that there are existing fire stations are in close proximity to the project site, it is not anticipated that there would be a need to build a

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[113] 2014 City of Los Angeles Fire Code, page 92

[114] Los Angeles Fire Department, https://www.lafd.org/fsla/stations-map, Fire Station 67, January-June 2018, *accessed July 16, 2018*.

new or expand an existing fire station to serve the proposed project and maintain acceptable service ratios, response times, or other performance objectives for fire protection. By analyzing data from previous years and continuously monitoring current data regarding response times, types of incidents, and call frequencies, LAFD can shift resources to meet local demands for fire protection and emergency services. The proposed project would neither create capacity or service level problems nor result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.

The Proposed Project would be required to comply with the 2014 LAFC and any subsequent codes prior to the issuance of any construction permits, including the requirements for automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems, etc.). As specified in Table 507.3.1 of the 2014 LAFC, a fire flow of 4,000 gpm from four adjacent fire hydrants, flowing simultaneously, with 20 pounds per square inch (psi) minimum residual pressure is required for high density residential structures located in a neighborhood commercial area.[115] Construction of the Proposed Project would require the installation and/or upgrade of the existing utilities on the site, including the water supply infrastructure. Thus, the infrastructure would be designed and constructed in accordance with the specifications included in the 2014 LAFC, including the fire flow requirements outlined in Section 507.

A fire flow test would be performed during the permit review period to determine if any utility improvements are needed on the site and/or for the surrounding area to ensure adequate fire flows and infrastructure pursuant to the 2014 LAFC. Pursuant to the LAFC, all required infrastructure improvements would be operational prior to construction and/or operation of the Proposed Project. Residential access to the Project Site would be from the bridge across Centinela Creek, access via Beethoven Street. A drop-off and pick-up area for residents and their guests will be located in a motor court provided at the bridge terminus, which would also serve as the entry way to the two-way ingress/egress point to access the residential parking garage. All ingress/egress points would be constructed in conformance with the requirements of City standards, including LAFD access requirements. Consequently, emergency service responders would be able to access the Project Site and impacts would be less than significant.

Based on the above information, implementation of the Proposed Project would not result in any substantial adverse physical impacts associated with the provision of new or physically altered fire and/or emergency facilities and/or the need for new or physically altered fire and/or

[115] City of Los Angeles Fire Code, Section 507 Fire Protection Water Supplies, Table 507.3.1.

emergency facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable response times or other performance objectives.

In addition, the Los Angeles Fire Department (LAFD) issued an Interdepartmental Correspondence dated April 24, 2018 with requirements and recommendations for the proposed project. In addition, with the compliance with LAFD requirements and site plan review **Regulatory Compliance Measure RCM-PS-1,** listed below, the project would have a less-that-significant impact on fire protection services. No further analysis is required.

Regulatory Compliance Measure

RCM-PS-1: The Project Applicant shall incorporate all recommendations of the Fire Department relative to fire safety into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling units or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

b) Police protection?

Less Than Significant Impact. A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station. The determination of whether the project results in a significant impact on police protection shall be made considering the following factors: (a) the population increase resulting from the Proposed Project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for police services anticipated at the time of project buildout compared to the expected level of service available; and (c) whether the project includes security and/or design features that would reduce the demand for police services.

The Project Site is located in the Pacific Area division of the LAPD's West Bureau. The Pacific Area community is 25.74 square miles in size and has over 200,000 residents. Neighborhoods located in the Pacific area include Venice Beach, Oakwood, Mar Vista, Playa del Rey, Playa Vista,

Palms, and Westchester.[116] The Pacific Area is served by the Pacific Community Police Station, located at 12312 Culver Boulevard, approximately 2.0 miles northeast of the Project Site. Within the Pacific Area, the Proposed Project is located within Reporting District (RD) 1463. RD 1463 includes the communities of Playa del Rey, Playa Vista, and Westchester. **Table IV-32, Pacific Area Police Station Crime Statistics**, below, shows the year to date crime statistics for the Pacific Area Police Station service area.

Table IV-32
Pacific Area Crime Statistics

Type of Crime	2018 [a]	2017[a]	2016[a]	2015[a]
Part I Crimes[b]				
Violent Crimes				
Homicide	0	2	1	5
Rape	31	48	47	33
Robbery	88	108	88	83
Aggravated Assault	134	84	134	164
Subtotal	**270**	**242**	**270**	**285**
Property Crimes				
Burglary	589	632	439	358
Motor Vehicle Theft	237	246	240	304
Burglary – Theft from Vehicle	835	776	805	596
Personal / Other	809	803	939	764
Subtotal	**2,470**	**2,457**	**2,423**	**2,012**
Total 'Part 1' Crimes	**2,766**	**2,699**	**2,693**	**2,237**
Part II Crimes[b]				
Child/Spousal Abuse	136	144	145	112
Shots Fired	5	11	10	27
Shooting Victims	3	5	5	17

a – year-to-date (comparative for previous years)
b – crimes statistics are divided into categories to comply with the FBI's 'Uniform Crime Reporting Guidelines'.
Source: Los Angeles Police Department, West Los Angeles Area Profile, http://www.lapdonline.org/assets/pdf/wlaprof.pdf, accessed July 16, 2018.

Response times are an additional metric used by the LAPD to measure the adequacy of police service. Response time is defined as the total time from when a call requesting assistance is made until the time the first unit responds to the scene. Calls for police assistance are prioritized based on the type of call. Currently the LAPD's response time goal is seven minutes for high-priority

116 *Los Angeles Police Department, About Pacific, website: http://www.lapdonline.org/pacific_community_police_station/content_basic_view/1600, accessed April 28, 2017.*

calls and 40 minutes for non-emergency calls. The Pacific Area Division is currently meeting this response time goal.

The Proposed Project would increase the intensity of development on the site by adding new residential uses. The new 236 residential units, anticipated to generate up to approximately 685 residents, would be expected to increase the demand for police service. Implementation of the Proposed Project would result in an increase of residents and guests to the Project Site, thereby generating a potential increase in the number of service calls from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. The Proposed Project would include adequate and strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. The building and layout design of the Proposed Project would also include crime prevention features, such as nighttime security lighting and secure parking facilities. In addition, the continuous visible and non-visible presence of residents at all times of the day would provide a sense of security during evening and early morning hours. As such, the project residents would be able to monitor suspicious activity at the building entry points. These preventative and proactive security measures would decrease the amount of service calls to the LAPD. During construction, security measures will be provided including security fencing, lighting, and locked entries around the construction zones.

Through the incorporation of these techniques into the project design, in combination with the safety features already incorporated into the proposed project, the proposed project would neither create capacity/service level problems nor result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for police protection. Regarding operations, in the event a situation should arise requiring increased staffing or patrol units, additional resources can be called in. Therefore, the proposed project would result in a less-than-significant impact related to police protection services. With adherence to the **Regulatory Compliance Measure RCM-PS-2** identified below, the Proposed Project's potential impact upon LAPD services would be considered less than significant. No further analysis is necessary.

Regulatory Compliance Measure

RCM-PS-2: The Applicant shall submit site plans and building plans as necessary to the LAPD Crime Prevention Unit to ensure the design incorporates building design

standards that enhance police protection and meet *Design Out Crime* Guidelines. The project plans shall incorporate the Design Guidelines (defined in the following sentence) relative to security, semi-public and private spaces, which may include but not be limited to, access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the Project Site if needed, as outlined in "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Los Angeles Police Department prior to the issuance of building permits.

The project includes, but is not limited to, the following features:

- Natural surveillance: Physical features, activities, and people gathering areas are placed in a way that maximizes visibility.
- Mix of uses that provide good visual connection between uses, and no ambiguous unassigned spaces.
- Natural access control: Restricting or encouraging people to come into a space through the placement of entrances, exits, fencing, landscaping, and lighting, which provide nighttime vision for pedestrians, homeowners and business people to permit pedestrians to see one another.
- Clear well lit paths from the street to the development through parking and landscape areas and within the development to building entries.
- Territorial reinforcement: The establishment of the building perimeter creates physical attributes to define ownership and separate public and private spaces.

c) Schools?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). The determination of whether the project results in a significant impact on public schools shall be made considering the following factors: (a) the population increase resulting from the project, based on the net increase of residential units or square footage of non-residential floor area; (b)

the demand for school services anticipated at the time of project buildout compared to the expected level of service available (consider, as applicable, scheduled improvements to LAUSD services (facilities, equipment, and personnel) and the project's proportional contribution to the demand); (c) whether (and to the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and (d) whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD). The Project Site is located in LAUSD Board District 4. The Project Site is currently served by one elementary school, one middle school, and one high school. **Table IV-33, Resident Schools Serving the Project Site**, details the names, grades served, and location of each school.

Table IV-33
Los Angeles Public School Facilities That Would Serve the Project Site[117]

Public School Address	Current Capacity	Actual Enrollment	Current Seating Overage/Shortage	Total Rooms	Rooms In Use	Over Crowded Now?
Playa Vista Elementary School: 13150 W. Bluff Creek Drive	576	540	36	26	26	NO
Orville Wright Middle School: 6550 W 80th Street	845	709	136	53	51	NO
Venice High School: 13000 Venice Boulevard	2,493	2,039	454	104	97	NO

Source: Natalie Johnson, Los Angeles Unified School District, written correspondence, April 20, 2016.

The Proposed Project would increase the intensity of development on the site by adding new residential uses. The new 236 residential units, anticipated to generate up to approximately 685 residents, could increase enrollment at schools that serve the area. As shown in **Table IV-34, Student Generation Rates for Los Angeles Unified School District**, the Proposed Project would generate approximately 39 elementary students, 11 middle school students, and 22 high school students, for a total of approximately 72 students. Development of the proposed project would be subject to California Government Code Section 65995, which would allow LAUSD to collect impact fees from developers of new residential and commercial space. The Project Applicant would be required to pay mandatory developer fees to offset the Proposed Project's demands upon local schools. Pursuant to Government Code Section 65995, the development fees

[117] This table uses 2015-2016 data, as provided through the written correspondence from LAUSD.

authorized by SB 50 are deemed to be "full and complete school facilities mitigation." Conformance to California Government Code Section 65995 is deemed to provide full and complete mitigation of impacts to school facilities.

The Westside Neighborhood School, located at 5401 Beethoven Street and approximately 430 feet to the south of the Project Site, is a private independent school and therefore excluded from this analysis on public school services.

Thus, the Proposed Project's potential impact upon public school services would be less than significant by implementing **Regulatory Compliance Measure RCM-PS-3**. No further analysis is necessary.

Regulatory Compliance Measure

RCM-PS-3: Prior to issuance of a building permit, the General Manager of the City of Los Angeles, Department of Building and Safety, or designee, shall ensure that the Project Applicant has paid all applicable school facility development fees in accordance with California Government Code Section 65995.

Table IV-34
Student Generation Rates for Los Angeles Unified School District

Type of School	Student Generation Rates for Multi-Family Units	Number of Proposed Multi-Family Units	Number of Students Generated by the Project
Grades K-6	0.1649	236	39
Grades 7-8	0.0450	236	11
Grades 9-12	0.0943	236	22
Total			**72**

Generation rates are based on the 2012 LAUSD student generation rates for multi-family residential units found from the School Facilities Need Analysis for Los Angeles Unified School District.

d) Parks?

Less Than Significant Impact. A significant impact would occur if the proposed project would exceed the capacity or capability of the local park system to serve the proposed project. A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project or if the Proposed Project resulted in the construction of new recreation and park facilities that create

significant direct or indirect impacts to the environment. The City of Los Angeles Department of Recreation and Parks (RAP) is responsible for the provision, maintenance, and operation of public recreational and park facilities and services in the City. The Proposed Project would increase the intensity of development on the site by adding new residential uses. The new 236 residential units, anticipated to generate up to approximately 685 residents, could result in increased demand for parks and recreation facilities.

The Public Recreation Plan (PRP), a portion of the Service Systems Element of the City of Los Angeles General Plan, provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards. The desired long-range standard for local parks is based on two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks or four acres per 1,000 persons of combined neighborhood and community parks. The Recreation Plan notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of one (1) acre per 1,000 persons for neighborhood parks and one (1) acre per 1,000 persons for community parks, or two (2) acres per 1,000 people of combined neighborhood and community parks. It is important to note that these standards are Citywide goals and are not intended to be requirements for individual development projects. The Proposed Project is located within a highly developed area within the Westchester – Playa del Rey Community Plan Area. As shown in **Table IV-35**, **Recreation and Park Facilities within the Project Area** there are seven parks that equate to over 138 acres of parkland and public recreation facilities within a 3-mile radius of the Project Site.

Table IV-35
Recreation and Park Facilities within the Project Area

Facility Name	Park Size	Distance from Project Site	Amenities
Glen Alla Park	4.8 acres	0.61 mile	children's play area, multi-purpose field, tennis courts, basketball court, and picnic area
Culver Slauson Park & Recreation Center	3.2 acres	1.34 miles	barbecue pits, basketball courts (lighted / outdoor), children's play area, picnic tables, bike path, outdoor fitness equipment, tetherball

Table IV-35 Recreation and Park Facilities within the Project Area			
Facility Name	**Park Size**	**Distance from Project Site**	**Amenities**
Westchester Recreation Center and Pool	23.6 acres	1.44 miles	skate park, tennis courts, two indoor gyms, picnic areas with barbecue pits, baseball diamonds, multi-purpose field, basketball court, children's play area, and pool
Steve Soboroff Court Park	2.5 acres	1.7 miles	basketball courts (unlighted / outdoor), children's play area
Triangle Park	0.10 acres	2.02 miles	basketball courts (unlighted / outdoor), children's play area
Del Rey Lagoon	12.7 acres	2.06 miles	baseball diamond (lighted), basketball courts (lighted / outdoor), lake (no fishing)
Westchester Golf Course	69.0 acres	2.3 miles	15-hole executive golf course, driving range

Source: City of Los Angeles Department of Recreation and Parks website, http://www.laparks.org/maplocator?cat_id=697&geo[radius]=10&geo[latitude]=33.9794475&geo[longitude]=-118.4224755&address=5300 %20Beethoven %20St, %20Los %20Angeles, %20CA %2090066, %20USA, accessed May 2, 2017.

The LAMC 12.21.G requires the Proposed Project to provide 25,925 square feet of open space.[118] The Proposed Project would provide approximately 29,312 square feet of total open space per code requirements, to serve project residents and their guests. The Proposed Project would include a variety of on-site open space areas and additional amenities including, but not limited to: private balconies (8,850 sf), nature preserves (9,098 sf), public pedestrian and bicycle pathways (14,416) and green belt with public linear parks (23,696 sf). Therefore, the Proposed Project would achieve the required square feet of open space required by the LAMC.

As discussed in **Section 13(a)**, it is estimated that the development of the Proposed Project would result in an increase of 685 new residents to the area. Based on the standard parkland ratio goal of 4 acres per 1,000 residents, the Proposed Project would generate a Citywide goal of serving such residents with approximately 2.75 acres of additional public parkland. The Proposed Project would contribute towards the achievement of such goal through a combination of (1) on-site open

[118] 40 Studio @ 100 sf/ unit (<3 Habitable Rooms)= 4,000 sf, 111 One-BR @ 100 sf/ unit (<3 Habitable Rooms)= 11,100 sf, 81 Two-BR @ 125 sf/ unit (=3 Habitable Rooms)= 10,125 sf, 4 Three-BR @ 175 sf/ unit (>3 Habitable Rooms)= 700 sf

space proposed within the project, (2) payment of applicable taxes in accordance with LAMC Section 21.10.3(a)(1), and (3) the availability of existing park and recreation facilities within the area.

In addition to the on-site open space provided within the Proposed Project, the Proposed Project is subject to a tax of $200 per dwelling unit pursuant to LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax) for construction of apartment buildings. This tax, payable to the Department of Building and Safety, shall be deposited into a "Park and Recreational Sites and Facilities Fund" to be used exclusively for the acquisition and development of park and recreational sites. In accordance with LAMC Section 21.10.3(a)(1), this tax may be offset or reduced based on the amount of on-site open space and recreational amenities provided on-site. Therefore, under the City's mandatory Dwelling Unit Construction Tax, which is collected prior to a certificate of occupancy for residential land uses, per **Regulatory Compliance Measure RMC-PS-4**, the Proposed Project's impact upon parks and recreational facilities would be reduced to a less-than-significant level. Furthermore, pursuant to Section 12.33 of the Los Angeles Municipal Code, the applicant shall pay the applicable fees for the construction of dwelling units. Therefore, the proposed project would not create capacity or service level problems, or result in substantial physical impacts associated with the provision or new or altered parks facilities. Accordingly, the proposed project would result in a less-than-significant impact on park facilities. No further analysis is necessary

Regulatory Compliance Measure

RCM-PS-4: Pursuant to Section 21.10 of the Los Angeles Municipal Code, the applicant shall pay the Dwelling Unit Construction Tax for construction of apartment buildings.

e) Other Public Facilities?

Less than Significant Impact.

A significant impact would occur if the project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project site, necessitating new or physically altered public facilities, the construction of which would cause significant environmental impacts. Within the City of Los Angeles, the Los Angeles Public Library (LAPL) provides services at the Central Library, eight Regional Branch Libraries, and 64 Community Branch Libraries. There are a total of four public library facilities within two miles of the Project Site, the Mar Vista Branch Library, Lloyd Taber-Marina del Rey Library, Playa Vista Library, and Westchester Loyola Village

Library. The closest facility is the Playa Vista Library on 6400 Playa Vista Drive, approximately 3,500 feet south from the Project Site.

The need for public library services is generally calculated based on permanent population in a given area. As stated in **Section 13, Population and Housing,** the Proposed Project includes 236 residential units which would generate approximately 685 new residents in the project area, which could result in increased demand for library services and resources of the Los Angeles Public Library System.

The voters of the City of Los Angeles approved ballot Measure L in 2011, which amended the City Charter "… to incrementally increase the amount the City is required to dedicate annually from its General Fund to the Library Department to an amount equal to .0300 percent of the assessed value of all property in the City, and incrementally increase the Library Department's responsibility for its direct and indirect costs until it pays for all of its direct and indirect costs, in order to provide Los Angeles neighborhood public libraries with additional funding to help restore library service hours, purchase books and support library programs, subject to audits, using existing funds with no new taxes." Under the terms of Measure L, libraries will be required to pay for their own direct and indirect costs by July 2014.

LAPLs are currently adequately funded by Measure L to purchase books, materials, and provide extra services through the public library system.[119] Library funding is now mandated under the City Charter to be funded from property taxes including those assessed against the Proposed Project, which would increase with the new development. It is also anticipated that the Project would not conflict with the goals outlined in the Los Angeles General Plan, Los Angeles Public Library Strategic Plan 2015-2020, and the Palms–Mar Vista–Del Rey Community Plan.

Based on the above information, implementation of the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities and/or the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable response times or other performance objectives. Therefore, the proposed project would result in a less-than-significant impact on other public facilities, and no mitigation would be required.

[119] Measure L, Los Angeles Public Library

15. RECREATION

a) **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

Less than Significant Impact. See response to **Section 14(iv),** above.

b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

Less than Significant Impact. See response to **Section 14(iv)**, above.

16. TRANSPORTATION AND TRAFFIC

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??

Less Than Significant Impact with Mitigation Incorporated. A significant impact may occur if the project conflicts with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. The Proposed Project would provide a total of 236 apartment units. The following transportation and traffic analysis were based on the Traffic Impact Study for Del Rey Pointe (Traffic Study) by KOA Corporation (KOA), dated October 19, 2017, The Los Angeles Department of Transportation (LADOT) reviewed the Traffic Study and issued an Inter-Departmental Correspondence dated January 11, 2018 in concurrence with its findings. Both documents are included in **Appendix D-2 and D-2** to this Initial Study.

The project study area, as defined through consultation with LADOT staff, includes the following study intersections. Intersection A is not part of the main study area, but is being included for specialized signal warrant analysis:

1. Centinela Avenue and SR-90 WB Off Ramp
2. Centinela Avenue and SR-90 EB On-Off Ramp
3. Lincoln Boulevard and Jefferson Boulevard
4. Alla Road and Jefferson Boulevard
5. Beethoven Street and Jefferson Boulevard
6. McConnell Avenue and Jefferson Boulevard
7. Centinela Avenue/Campus Center Drive and Jefferson Boulevard
8. Centinela Avenue/Inglewood Boulevard and Jefferson Boulevard
9. Jefferson Boulevard at Freeway I-405 SB on and off Ramps
10. Jefferson Boulevard at Freeway I-405 NB on and off Ramps

A. Beethoven Street and Coral Tree Place

Figure IV-3, Study Intersection Locations illustrates the study intersection locations.

Figure IV-3, Study Intersection Locations

Project traffic impacts are analyzed for the weekday a.m. and p.m. peak-hour time periods at the study intersections. Traffic analysis in this section include the following scenarios:

- Existing (year 2017)
- Existing with Project (year 2017)
- Future without Project (year 2020)
- Future with Project (year 2020)

KOA coordinated with LADOT at the start of the traffic study to achieve consensus on assumptions such as study intersections, trip generation, and trip distribution. New traffic counts were collected at the study intersections on a weekday during the timeframes of 7:00 a.m. to 10:00 a.m. and 3:00 p.m. to 6:00 p.m. on Thursday February 16, 2017 and Tuesday March 14, 2017. Trip generation rates for project trips were based on those defined within *Trip Generation (9th Edition)*, published by the Institute of Transportation Engineers (ITE).

For analysis of Level of Service (LOS) at signalized intersections, LADOT has designated the Circular 212 Planning methodology as the desired tool. The concept of roadway level of service under the Circular 212 method is calculated as the volume of vehicles that pass through the facility divided by the capacity of that facility. A facility is "at capacity" (V/C of 1.00 or greater) when extreme congestion occurs. This volume/capacity ratio value is a function of hourly volumes, signal phasing, and approach lane configuration on each leg of the intersection.

Level of service (LOS) values range from LOS A to LOS F. LOS A indicates excellent operating conditions with little delay to motorists, whereas LOS F represents congested conditions with excessive vehicle delay. LOS E is typically defined as the operating "capacity" of a roadway. **Table IV-36, Level of Service as a Function of CMA Values** defines the level of service criteria applied to the study intersections.

Table IV-36
Level of Service as a Function of CMA Values

Level of Service	Description of Operating Characteristics	Range of CMA Values
A	Uncongested operations; all vehicles clear in a single cycle.	< 0.60
B	Same as above	>0.60<0.70
C	Light congestion; occasional backups on critical approaches.	>0.70<0.80
D	Congestion on critical approaches, but intersection functional. Vehicles required to wait through more than one cycle during short peaks. No long-standing lines formed.	>0.80<0.90
E	Severe congestion with some long-standing lines on critical approaches. Blockage of intersection may occur if traffic signal does not provide for protected turning movements.	>0.90<1.00
F	Forced flow with stoppages of long duration.	>1.00

Notes: CMA = Critical Movement Analysis; LOS = Level of Service
Source: KOA. 2017

Based on the existing traffic volumes and intersection geometries depicted in the Traffic Study provided in **Appendix D-1,** volume-to-capacity ratios and corresponding levels of service (LOS) were determined for the study intersections during the weekday a.m. and p.m. peak hours.

Traffic impacts are identified if a proposed development will result in a significant change in traffic conditions at a study intersection. A significant impact is typically identified if project-related traffic will cause service levels to deteriorate beyond a threshold limit specified by the overseeing agency. Impacts can also be significant if an intersection is already operating below an acceptable level of service and project related traffic will worsen conditions within the specified threshold range.

The City of Los Angeles Department of Transportation has established specific thresholds for project-related increases in the volume-to-capacity ratio (V/C) of signalized study intersections. The following increases in peak-hour V/C ratios are considered significant impacts:

Table IV-37
Significance Threshold

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

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

Table IV-38, Study Intersections - Existing Conditions summarizes the volume/capacity ratios and LOS values of existing conditions. As indicated by the data within this table, eight of the ten signalized study intersections are currently operating LOS D or better during the weekday a.m. and p.m. peak hours.

Table IV-38
Study Intersection - Existing Conditions

Study Intersections		AM Peak		PM Peak	
		V/C	LOS	V/C	LOS
1	Centinela Avenue & SR-90 WB Off-Ramp	0.526	A	0.467	A
2	Centinela Avenue & SR-90 EB Ramps	0.570	A	0.452	A
3	Lincoln Boulevard & Jefferson Boulevard	0.899	D	0.685	B
4	Alla Road & Jefferson Boulevard	0.484	A	0.603	B
5	Beethoven Street & Jefferson Boulevard	0.345	A	0.403	A
6	McConnell Avenue & Jefferson Boulevard	0.379	A	0.361	A
7	Centinela Avenue / Campus Ctr. Drive & Jefferson Boulevard	0.885	D	0.604	B
8	Centinela Avenue / Inglewood Boulevard & Jefferson Boulevard	0.992	**E**	1.105	**F**
9	I-405 SB Ramps & Jefferson Boulevard	0.760	C	0.611	B
10	I-405 NB Ramps & Jefferson Boulevard	1.037	**F**	1.181	**F**

LOS = Level of Service
V/C Volumes to Capacity Ratio
Source: KOA. 2017

The following intersections are operating at LOS E or F during the analyzed peak hours under existing conditions.

- Centinela Avenue/Campus Center Drive at Jefferson Boulevard – operating at LOS E during the a.m. peak hour, and LOS F during the p.m. peak hour
- Jefferson Boulevard at Freeway I-405 northbound on-and-off ramps – operating at LOS F during both weekday a.m. and p.m. peak hours

Trip rates for the associated traffic generation forecast is provided in **Table IV-39, Project Trip Generation.**

Table IV-39
Project Trip Generation

Proposed Use	ITE Land Use	Rate	Daily	AM Peak Hour			PM Peak Hour		
				I/B	O/B	Total	I/B	O/B	Total
Apartments	220	per du	6.65	20 %	80 %	0.51	65 %	35 %	0.70
Estimated Trips									
Apartments	220	236 units	1,569	24	96	120	107	58	165
Total			1,569	24	96	120	107	58	165

Source: KOA. 2017

The Proposed Project is projected to generate approximately 1,569 weekday daily trips, including 120 trips during the a.m. peak hour (24 inbound trips and 96 outbound trips) and 165 trips during the p.m. peak hour (107 inbound trips and 58 outbound trips).

Traffic volumes for existing conditions with the addition of project-generated traffic were derived by adding the net project trips to the existing traffic volumes. **Table IV-40, Study Intersections - Existing with-Project Conditions** summarizes the resulting V/C and LOS values at the study intersections for the existing-with project conditions.

Table IV-40
Study Intersections - Existing with-Project Conditions

	Study Intersections	AM Peak		PM Peak		Sig Impact?
		V/C	LOS	V/C	LOS	
1	Centinela Avenue & SR-90 WB Off-Ramp	0.527	A	0.468	A	No
2	Centinela Avenue & SR-90 EB Ramps	0.572	A	0.458	A	No
3	Lincoln Boulevard & Jefferson Boulevard	0.905	E	0.689	B	No
4	Alla Road & Jefferson Boulevard	0.491	A	0.607	B	No
5	Beethoven Street & Jefferson Boulevard	0.386	A	0.463	A	No
6	McConnell Avenue & Jefferson Boulevard	0.382	A	0.377	A	No
7	Centinela Avenue / Campus Ctr. Drive & Jefferson Boulevard	0.891	D	0.627	B	No
8	Centinela Avenue / Inglewood Boulevard & Jefferson Boulevard	1.003	**F**	1.105	**F**	**Yes (AM)** No (PM)
9	I-405 SB Ramps & Jefferson Boulevard	0.768	C	0.618	B	No
10	I-405 NB Ramps & Jefferson Boulevard	1.043	**F**	1.185	**F**	**No**

LOS = Level of Service
V/C Volumes to Capacity Ratio
Source: KOA. 2017

Seven out of the ten study intersections are projected to continue operating at of LOS D or better under existing with-project conditions during the weekday a.m. and p.m. peak hours.

Under existing with project conditions, the following intersections would operate at LOS E or F during the analyzed peak hours:

- Lincoln Boulevard and Jefferson Boulevard is projected to worsen in operations from LOS D to LOS E in the a.m. peak hour.
- Centinela Avenue/Inglewood Boulevard and Jefferson Boulevard is projected to worsen in operations from LOS E to LOS F in the a.m. peak hour, and worsen within LOS F in the p.m. peak hour.
- Jefferson Boulevard and Freeway I-405 northbound on-and-off ramps would worsen within LOS F during both a.m. and p.m. peak hours.

The Proposed Project is anticipated to **have significant traffic impact** at the intersection of Centinela Avenue-Inglewood Boulevard and Jefferson Boulevard under the analyzed Existing with-Project Traffic Conditions. Recommended mitigation measures are discussed below.

The Future 2020 without-project condition analysis in the study area includes ambient growth and area/cumulative projects added but without the Proposed Project. The year 2020 was selected for analysis based on the anticipated completion date of the project.

For the analysis of background traffic for year 2020, a traffic growth factor of 1.00 percent per year was utilized to provide for increases in traffic from the existing (2017) traffic volumes. To apply this ambient growth rate to the existing traffic volumes, a factor of 1.0303 was utilized. This factor simulates a one percent increase over a three-year period between existing (2017) and future (2020) conditions. Based on a review of the area projects lists provided by LADOT Development Review, Los Angeles County Department of Regional Planning, and Culver City, 24 area projects were included in the traffic analysis. These projects are all located within an approximate two-mile radius from the Project Site. **Figure IV-4, Location of Related Projects** and **Table IV-41, Area/Cumulative Projects Trip Generation.**

Figure IV-4, Location of Related Projects

Table IV-41
Area/Cumulative Projects Trip Generation.

Map ID	Name	Location	Land Use	Intensity	Units	Daily Total	AM Peak Hour			PM Peak Hour		
							In	Out	Total	In	Out	Total
City of Los Angeles												
1	MDR Tower	4363 Lincoln Boulevard	Retail	3.178	k.s.f.	136	2	1	3	8	8	16
			Condominiums	158	d.u.	926	12	58	70	74	37	111
					Subtotal:	1,062	14	59	73	82	45	127
2	LMU Master Plan	1 LMU Drive	University Expansion	7,800	students	2,540	115	32	147	82	175	257
3	Mixed-Use: Residential/Office	4210 S Del Rey Avenue	Condominiums	136	d.u.	627	24	47	71	48	37	85
			Office	20.000	k.s.f.							
4	Village at Playa Vista Phase II	s/o Jefferson Boulevard/Westlawn Avenue	Condominiums	2,600	d.u.	24,220	577	1,049	1,626	1,275	1,027	2,302
			Office	175	k.s.f.							
			Retail	150	k.s.f.							
			Community Serving	40	k.s.f.							
5	Ballona Wetlands Restoration Project	Ballona Wetlands	Urban Ecology Center	46	k.s.f.	1,530	38	4	42	57	147	204
			Ecological Reserve	600	acre							
6	Hooman	5448 Mesmer	Other	113163	s.f.	2,694	139	44	183	90	176	266
7	Mixed-Use	4040 S Del Rey Ave	Mixed Use	195	units	1,839	-50	139	88	149	-28	121
			Mixed Use	235	units							
8	Teledyne Office Project	12964 W Panama St	Office	159,000	s.f.	777	72	9	81	20	71	91
9	New Multi-Story Office Building	12575 W Beatrice St	Office	199,500	s.f.	1,946	242	33	275	57	277	334
10	Expansion of Charter School	4471 Inglewood Blvd	School	800	Students	275	55	45	100	45	31	67
11	Mixed Use Project	4065 S Glencoe Ave	Office	35,206	s.f.	-191	67	38	105	2	99	101
			Retail	1,500	s.f.							
			Apartments	49	units							
			Other	14	bays							
			Industrial	5,050	s.f.							
			Mixed Use		other							
12	COU Warehouse to Office	4721 S Alla Rd	Office	118,352	s.f.	267	38	5	43	9	48	57
13	Apartment Bldg	13488 W Maxella Ave	Apartments	65	units	362	6	23	29	26	14	40
24	Ocean Charter School	12870 Panama St	School (K-8)	532	students	862	263	216	479	79	89	168
Los Angeles Subtotal						**38,810**	**1,600**	**1,743**	**3,342**	**2,021**	**2,208**	**4,220**
City of Culver City												
14	Grandview Apartments	4025 Grand View Blvd	Apartments	36	d.u.	239	3	15	18	16	9	25
15	Washington Place Condos	12464 Washington Place	Condominiums	3	d.u.	17	0	1	1	1	1	2
16	Office Building	12038 Washington Boulevard	Office	2.685	k.s.f.	30	3	1	4	1	3	4
17	Pennylane Mixed Use Washington/Inglewood	11924 Washington Blvd	Restaurant	3.750	k.s.f.	477	22	18	40	23	16	39
			Specialty Retail	11.250	k.s.f.	499	9	6	15	13	17	30
			Apartments	98.000	units	652	10	40	50	45	24	69
					Subtotal:	1,914	47	80	129	99	70	170
18	Townhome Development	4118 Wade Street	Townhome	4	units	23	0	2	2	2	1	3
19	Office/Retail Building	13112-13114 Washington Blvd	Shopping Center	1.536	k.s.f.	66	1	0	1	3	3	6
			Apartments	2	d.u.	13	0	1	1	1	0	1
			Office	3.702	k.s.f.	41	5	1	6	1	5	6
					Subtotal:	120	6	2	8	5	8	13
20	Baldwin Site	12803 Washington Blvd	Apartments	37	d.u.	246	25	100	125	17	9	26
			Shopping Center	7.206	k.s.f.	308	4	3	7	13	14	27
					Subtotal:	554	29	103	132	30	23	53
21	Market Hall	12403 Washington Blvd	Supermarket	31.590	k.s.f.	3,230	67	40	107	153	147	299
22	Kayvon Mixed Use	12712-12718 Washington Boulevard	Shopping Center	3.308	k.s.f.	141	2	1	3	6	6	12
			Apartments	5	d.u.	33	1	2	3	2	2	4
					Subtotal:	175	2	3	6	8	8	16
Culver City Subtotal						**6,301**	**158**	**246**	**408**	**315**	**269**	**584**
Los Angeles County												
23	Professional Office Building	5465 Centinela Ave	Office	2.915	k.s.f.	32	44	6	50	13	62	75
NET TOTAL						**45,143**	**1,802**	**1,995**	**3,800**	**2,349**	**2,539**	**4,879**

d.u. = dwelling units, k.s.f. = 1,000 square feet of floor area

Trip Generation Rates Source: Institute of Transportation Engineers (ITE) "Trip Generation - 9th Edition".

Table IV-42, Study Intersection - Future (Year 2020) without Project Conditions summarizes the V/C and LOS values at the study intersections for this scenario.

Table IV-42
Study Intersections - Future (Year 2020) without Project Conditions

	Study Intersections	AM Peak		PM Peak	
		V/C	LOS	V/C	LOS
1	Centinela Avenue & SR-90 WB Off-Ramp	0.527	A	0.515	A
2	Centinela Avenue & SR-90 EB Ramps	0.631	B	0.523	A
3	Lincoln Boulevard & Jefferson Boulevard	0.954	**E**	0.768	C
4	Alla Road & Jefferson Boulevard	0.533	A	0.686	B
5	Beethoven Street & Jefferson Boulevard	0.411	A	0.479	A
6	McConnell Avenue & Jefferson Boulevard	0.417	A	0.410	A
7	Centinela Avenue / Campus Ctr. Drive & Jefferson Boulevard	0.989	**E**	0.708	C
8	Centinela Avenue / Inglewood Boulevard & Jefferson Boulevard	1.133	**F**	1.243	**F**
9	I-405 SB Ramps & Jefferson Boulevard	0.899	D	0.738	C
10	I-405 NB Ramps & Jefferson Boulevard	1.100	**F**	1.256	**F**

LOS = Level of Service
V/C Volumes to Capacity Ratio
Source: KOA. 2017

Six out of the ten study intersections are projected to operate at LOS D or better under the future without project conditions during the weekday a.m. and p.m. peak hours. Under the future without project conditions, the following intersections would operate at LOS E or LOS F:

- Lincoln Boulevard and Jefferson Boulevard is projected to worsen in operations from LOS D to LOS E during the a.m. peak hour.
- Centinela Avenue-Campus Center Drive and Jefferson Boulevard would worsen in operations from LOS D to LOS E during the a.m. peak hour.
- Centinela Avenue-Inglewood Boulevard and Jefferson Boulevard would worsen in operations from LOS E to LOS F during the a.m. peak hour, and would continue to operate at LOS F during the p.m. peak hour.
- Jefferson Boulevard at Freeway I-405 northbound on and off ramps would continue to operate at LOS F during both the a.m. and p.m. peak hours.

The Future (Year 2020) with Project Conditions documents cumulative traffic conditions with the addition of project-generated traffic. Traffic volumes for these conditions were derived by adding the net project trips to the future without-Project volumes.

Table IV-43, Study Intersections – Future (Year 2020) with Project Conditions, summarizes the resulting V/C and LOS values at the study intersections.

Table IV-43
Study Intersection - Future (Year 2020) with Project Conditions

	Study Intersections	AM Peak		PM Peak		Sig Impact?
		V/C	LOS	V/C	LOS	
1	Centinela Avenue & SR-90 WB Off-Ramp	0.527	A	0.519	A	No
2	Centinela Avenue & SR-90 EB Ramps	0.633	B	0.529	A	No
3	Lincoln Boulevard & Jefferson Boulevard	0.959	**E**	0.780	C	No
4	Alla Road & Jefferson Boulevard	0.540	A	0.691	B	No
5	Beethoven Street & Jefferson Boulevard	0.452	A	0.539	A	No
6	McConnell Avenue & Jefferson Boulevard	0.421	A	0.426	A	No
7	Centinela Avenue / Campus Ctr. Drive & Jefferson Boulevard	0.995	**E**	0.725	C	No
8	Centinela Avenue / Inglewood Boulevard & Jefferson Boulevard	1.144	**F**	1.249	**F**	**Yes (AM)** No (PM)
9	I-405 SB Ramps & Jefferson Boulevard	0.907	**E**	0.746	C	No
10	I-405 NB Ramps & Jefferson Boulevard	1.107	**F**	1.260	**F**	No

LOS = Level of Service
V/C Volumes to Capacity Ratio
Source: KOA. 2017

Five out of the ten study intersections are projected to operate at LOS D or better under the future without Project conditions during the weekday a.m. and p.m. peak hours. Under the future with project conditions, the following intersections would operate at LOS E or LOS F:

- Lincoln Boulevard and Jefferson Boulevard is projected to worsen within operations at LOS E during the a.m. peak hour.
- Centinela Avenue-Campus Center Drive and Jefferson Boulevard is projected to worsen within operations at LOS E during the a.m. peak hour.
- Centinela Avenue-Inglewood Boulevard and Jefferson Boulevard is projected to worsen within operations at LOS F during the a.m. and p.m. peak hours.
- Jefferson Boulevard and Freeway I-405 southbound on and off ramps is projected to worsen in operation from LOS D to LOS E during the a.m. peak hour.
- Jefferson Boulevard and Freeway I-405 northbound on and off ramps is projected to worsen within operations at LOS F during the a.m. and p.m. peak hours.

The Proposed Project is anticipated to have significant traffic impact at the intersection of Centinela Avenue-Inglewood Boulevard and Jefferson Boulevard under the analyzed future 2020 with project traffic conditions.

However the project applicant has agreed to implement a Transportation Demand Management and Monitoring Program (TDM&MP) to help reduce vehicle trips to and from the Project Site. The components of the TDM&MP are described below in **Mitigation Measures MM-TRA-1** and **MM-TRA-2**. The TDM&MP was prepared by KOA Corporation dated March 18, 2018 (see **Appendix D-3**), and was reviewed and accepted by LADOT in correspondence dated April 23, 2019 (see **Appendix D-4**).

Furthermore, two characteristics of the project will reduce peak-hour trips, versus a typical residential or commercial/industrial project in the area:

- The Proposed Project will generate less peak trips, and will focus fewer trips in peak periods, than a project under the current approved zoning for the site.
- Area employment characteristics generally generate mid/late morning inbound trips and evening outbound trips, so commute patterns to/from site will not overlap with school and industrial site peaks.

It is assumed that implementation of the TDM&MP will reduce the generated project vehicle trips by at least 20 percent. In order to provide verification to LADOT that the 20 percent project trips reduction that is needed to attain full mitigation is being achieved, the project shall implement a trip cap monitoring program. The trip cap threshold for both the a.m. and p.m. peak hours shall be 96 and 132 one-way vehicle trips, respectively. The measurement of actual trips and monitoring shall be conducted using an automated detection and surveillance monitoring system, per conditions to be defined by LADOT. The monitoring program will need to continue until such time that the project has shown, for no less than five consecutive years, at a minimum of 85 percent occupancy, achievement of the peak hour trip volume requirements. Should the review show that the peak hour trip cap threshold has been exceeded, the project will be subject to a penalty program, to be defined by LADOT.

As shown in **Table IV-44, Project Trip Generation with Transportation Demand Management and Monitoring Program**, a 20 percent reduction in trip generation is applied to the project vehicle trip generation. The trip totals are reduced to approximately 1,255 weekday daily trips.

Table IV-44
Project Trip Generation with Transportation Demand Management and Monitoring Program

Proposed Use	ITE Land Use	Rate	Daily	AM Peak Hour			PM Peak Hour		
				I/B	O/B	Total	I/B	O/B	Total
Apartments	220	per du	6.65	20 %	80 %	0.51	65 %	35 %	0.70
Estimated Trips									
Apartments	220	236 units	1,569	24	96	120	107	58	165
Total			1,569	24	96	120	107	58	165
Transportation Demand Management Credit									
20 % reduction			-314	-5	-19	-24	-21	-12	-33
Net Project Trips			1,255	19	77	96	86	46	132

Source: KOA. 2017

The effects of the TDM&MP and the assumed 20 percent reduction in vehicle trips at the study intersection are summarized within **Table IV-45, Effects of Mitigation Measure on Study Intersection.** The reduction in vehicle trips generated by the project due to implementation of the TDM&MP would fully mitigate the identified significant impacts.

Table IV-45
Effects of Mitigation Measure on Study Intersection.

Study Intersection (Existing Plus Project)	AM Peak		PM Peak		Sig Impact?
	V/C	LOS	V/C	LOS	
Centinela Avenue – Inglewood Boulevard & Jefferson Boulevard	1.001	F	1.110	F	No
Study Intersection (Future with Project)					
Centinela Avenue – Inglewood Boulevard & Jefferson Boulevard	1.142	F	1.248	F	No

Source: KOA. 2017

Mitigation Measures

MM-TRA-1 The Project Applicant shall implement a Transportation Demand Management and Monitoring Program (TDM&MP) to help reduce vehicle trips to and from the Project Site. The TDM&MP shall be developed in collaboration with LADOT.

The TDM&MP shall include, but is not limited to, the following elements:

- Implement a bike/pedestrian bridge across Ballona Creek that connects the Project Site to the existing Ballona Creek bike path, if feasible, and if the State, County and/or private owner of connecting northern link not under control of the project applicant grants a connecting easement;

- Provide a dedicated shuttle service which should be provided with the following parameters:
  - The shuttle will operate from 7:30 a.m. to 9:00 p.m. daily;
  - On weekdays, the route will serve employment centers in the area and commercial areas along Jefferson Boulevard including Playa Vista;
  - The weekend route will serve commercial areas and recreational areas;
- Provide an internal Transportation Management Coordination Program with an on-site transportation coordinator;
- Design the Project to ensure a bicycle, pedestrian and transit friendly environment;
- Provide rideshare program and support for Project tenants with an on-site transportation coordinator;
- Allow for subsidized transit passes for eligible Project tenants;
- Coordinate with LADOT to determine if the site would be eligible for one or more of the services to be provided by the future Mobility Hubs program (secure bike parking, bike share kiosks, and car-share parking spaces);
- Provide on-site transit routing and schedule information;
- Provide a program to discount transit passes for residents possibly through negotiated bulk purchasing of passes with transit providers;
- Contribute a one-time fixed fee into the City's Bicycle Plan Trust Fund to implement bicycle improvements within the area of the Proposed Project. Amount of the fee is to be determined in consultation with LADOT and Council District 11 staff.
- Provide a Guaranteed Ride Home Program.

MM-TRA-2 The Project Applicant, in collaboration with LADOT, shall implement trip a cap monitoring program for the monitoring of vehicle trips after Project opening and implementation of the TDM&MP. The trip cap threshold for both the a.m. and p.m. peak hours shall be 96 and 132 one-way vehicle trips, respectively. The measurement of actual trips and monitoring shall be conducted using an automated detection and surveillance monitoring system, per conditions to be defined by LADOT. The monitoring program shall continue until such time that the Project has shown, for no less than five consecutive years, at a minimum of 85 percent occupancy, achievement of the peak hour trip volume requirements. Should the review show that the peak hour trip cap threshold has been exceeded, the project will be subject to a penalty program, to be defined by LADOT. A full detailed description of the TDM&MP, and all subsequent TDMMP reporting, should be prepared by a licensed Traffic Engineer and submitted to DOT for review. The TDMMP Plan should be submitted to DOT and the Department of City Planning for review and approval, prior to the issuance of any certificate of occupancy.

Residual Impact

Residual impacts would be less than significant.

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?

Less than Significant Impact. A significant impact may occur if the proposed project individually or cumulatively exceeded the service standards of the Los Angeles County Metropolitan Transportation Authority (Metro) Congestion Management Program (CMP). This program was created Statewide as a result of Proposition 111 and has been implemented locally by Metro. The congestion management program (CMP) in effect in Los Angeles County was issued by the Los Angeles County Metropolitan Transportation Agency in 2010.

The CMP for Los Angeles County requires that the traffic impact of individual development projects of potentially regional significance be analyzed. A specific system of arterial roadways plus all freeways comprises the CMP system. Per CMP Transportation Impact Analysis (TIA) Guidelines, a traffic impact analysis is conducted where:

- At CMP arterial monitoring intersections, including freeway on-ramps or off-ramps, where the Proposed Project will add 50 or more vehicle trips during either a.m. or p.m. weekday peak hours.

- At CMP mainline freeway-monitoring locations, where the project will add 150 or more trips, in either direction, during the either the a.m. or p.m. weekday peak hours.

The two nearest CMP arterial monitoring intersections (1.5-miles) are located at:

- Lincoln Boulevard & Manchester Avenue
- Lincoln Boulevard & Marina Highway

Based on the project trip generation and the distance of this location from the Project Site, according to the Traffic Study by KOA Corporation dated October 19, 2017, it is not expected that 50 or more new trips per hour would be added at these CMP intersections. The Los Angeles Department of Transportation (LADOT) reviewed the Traffic Study and issued an Inter-Departmental Correspondence dated January 11, 2018 in concurrence with its findings. Both documents are included in **Appendix D-1 and D-2** to this Initial Study. Therefore, no further analysis of potential CMP impacts is required.

The nearest freeway monitoring station is located on Interstate 405 east of Venice Boulevard, which is about 2.2-miles from the Project Site. The project is not expected to add more than 150 trips at this location. Therefore, impacts to a CMP would be less than significant and no further analysis is required.

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?

No Impact. A significant impact would occur if the proposed project would cause a change in air traffic patterns that would result in a substantial safety risk. As previously stated in **Section 8, Hazards and Hazardous Materials**, the Project Site is not located within an airport land use plan. Los Angeles International Airport is located approximately 2.0 miles south of the Project Site. The Project Site is located within an airport hazard zone (250 foot height limit above Elevation 126). The Project would be a maximum of 56 feet in height and elevations on the Project Site range from 5-40 feet.[120] However, because the project is not located within the LAX planning boundary, the LAX influence boundary, or the LAX noise contours, safety hazards for people residing in the

[120] Google Earth Pro, 5000 Beethoven Street, Los Angeles, CA, accesses March 12, 2018.

project area would be less than significant. The proposed project does not include an aviation component or include features that would interfere with air traffic patterns.

No impact would occur and no further analysis is required.

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact with Mitigation Incorporated. A significant impact would occur if the proposed project would substantially increase an existing hazardous design feature or introduce incompatible uses to the existing traffic pattern. The Proposed Project would provide a new vehicular bridge and driveway across Centinela Creek to the south, as well as a pedestrian/bicycle bridge across Ballona Creek to the north, to provide access for residents of the Proposed Project, which if not properly designed and constructed, could potentially conflict with pedestrian circulation in the project area. The design of the Proposed Project would not cause a permanent alteration to the local vehicular circulations routes and patterns, or impede public access or travel on any public rights-of-way. The new bridge across Ballona and Centinela Creek would undergo extensive review through the Bureau of Engineering (BOE). Further, the final design of the Proposed Project, including curb cuts, ingress, egress, and other streetscape changes, would be subject to review by the LADBS, Public Works and the Department of Transportation and would be required to comply with all requirements of those agencies. Furthermore, the project may have potentially significant impacts on pedestrians on the street. With implementation of the referenced mitigation measure, the potential impacts related to hazards due to a design feature would be reduced to less-than-significant.

MM-TRA-3 **Safety Hazards**. Environmental impacts may result from project implementation due to hazards to safety from design features (e.g., sharp curves or dangerous intersections) or incompatible uses. However, the potential impacts can be mitigated to a less than significant level by the following measure.

- The developer shall install appropriate traffic signs around the site to ensure pedestrian, bicycles, and vehicle safety.
- The applicant shall submit a parking and driveway plan that incorporates design features that reduce accidents, to the Bureau of Engineering and the Department of Transportation for approval.

e) Result in inadequate emergency access?

Less Than Significant Impact with Mitigation Incorporated. A significant impact may occur if the project design threatened the ability of emergency vehicles to access and serve the project site or adjacent uses. Jefferson Boulevard, Lincoln Boulevard, and Centinela Avenue are designated as Disaster Routes in the General Plan Safety Element's Critical Facilities & Lifeline Systems Map (Exhibit H).[121] However, neither the construction nor the operation of the Proposed Project would require or result in modifications to any of these identified roadways that would impact emergency traffic. The proposed project would not require the closure of any public or private streets and would not impede emergency vehicle access to the project site or surrounding area. Construction of the Proposed Project could temporarily interfere with local and on-site emergency response. However, construction traffic would conform to all traffic work plan and access standards to allow adequate emergency access. Implementation of a Construction Management Plan per RCM-AQ-1, and compliance with access standards would reduce the potential for the impacts on haul routes, emergency response and access during construction of the Proposed Project. The majority of construction activities for the Proposed Project would be confined to the site, except for infrastructure improvements, which may require some work in adjacent street rights-of-way. However, this work would be short-term and temporary, and would occur during off-peak periods.

In addition, the Applicant will submit a parking and driveway plan for review by the LAFD, the BOE and the LADOT to ensure compliance with all applicable code-required site access and circulation requirements, as well as code-required emergency access. The new bridges would be constructed in accordance with all applicable BOE and LAFD codes to allow for proper emergency vehicle ingress and egress. Therefore, the proposed project would not result in inadequate emergency access. Impacts would be less than significant with mitigation and no further analysis is necessary.

MM-TRA-4 **Inadequate Emergency Access.** Environmental impacts may result from project implementation due to inadequate emergency access. However, these impacts can be mitigated to a less than significant level by the following measure:

- The applicant shall submit a parking and driveway plan to the Bureau of Engineering and the Department of Transportation for approval that provides code-required emergency access.

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

Less than Significant Impact. A significant impact may occur if the proposed project would conflict with adopted policies or involve modification of existing alternative transportation facilities located on- or off-site. In 2008, the California State Legislature adopted AB 1358, The Complete Streets Act, which requires local jurisdictions to "plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban or urban context." In compliance with AB 1358, the City of Los Angeles adopted the Mobility Plan 2035 as an element of its General Plan in September 2016. The Mobility Plan 2035 identifies several areas in the Project vicinity on the enhanced network concept maps for transit (Map B), neighborhood circulation (Maps C1 and C3), bicycle lanes (Maps D1 and D2), and pedestrians (Map F). While none of these networks/maps incorporate the Project Site specifically, the Site's proximity to facilities identified on these networks along with Project features, including a bridge across Ballona and Centinela Creek connecting to the existing Ballona Creek Bike Path, and protected bike lanes and sidewalks for residents and visitors surrounding the Project Site, would serve to reinforce these networks and concepts.

The Project area is adjacent to an urbanized area that is served by local bus lines with bus stops along Jefferson Boulevard to the south and Culver Boulevard to the north, including the Los Angeles County Metropolitan Transportation Authority [Metro] (routes 108 and 110), Culver CityBus (routes 4 and 7) and the Los Angeles Department of Transportation (LADOT) (Commuter Express route 437). The project would promote multimodal transportation, including bicycles, through the implementation of a TDM&MP program as required per **MM-TRA-1,** that would include, but is not limited to the following:

- A privately funded fixed route shuttle that would provide drop off and pick up service to nearby transit stations, entertainment and work centers;
- An on-Site Transit Plaza feature, to facilitate access to public transportation for both residents and visitors, featuring a centralized rideshare (i.e. Uber and Lyft) pick up and drop off location, and zip cars;
- Electric vehicle (EV) charging stations for use by visitors and residents;

121 *City of Los Angeles City Planning Department, Environmental and Public Facilities Maps, Critical Facilities & Lifeline Systems in the City of Los Angeles, September 1996,(General Plan Safety Element, Exhibit H: Critical Facilities & Lifeline Systems, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf).*

- Carpool and ride-share notices and postings;
- A satellite remote work center for residents who wish to telecommute to work; and
- Ample short and long term bicycle parking.

The TDM&MP was prepared by KOA Corporation dated March 18, 2018 (see **Appendix D-3**), and was reviewed and accepted by LADOT in correspondence dated April 23, 2019 (see **Appendix D-4**). The project would also include 276 bicycle parking spaces (36 short-term and 240 long-term). The Proposed Project is also within walking distance to a variety of shops and services for residents (e.g., retail, schools, businesses etc.) in the Del Rey community and nearby Playa Vista neighborhood.

The proposed project would not require the disruption of public transportation services or the alteration of public transportation routes. For these reasons, the Proposed Project is not anticipated to conflict with adopted policies, plans or programs of transportation facilities. Impacts would be less than significant, and no further analysis is necessary.

17. TRIBAL CULTURAL RESOURCES

This section is based on the information provided in the California Historical Resources Information System (CHRIS) search report from the South Central Coastal Information Center dated December 22, 2017, Cultural Resources Evaluation Letter prepared by ASM Affiliates dated January 4, 2019, and Sacred Lands File (SLF) search report from the Native American Heritage Commission dated October 24, 2017. The CHRIS and SLF Reports and Cultural Resources Evaluation Letter are incorporated herein by this reference, and provided in **Appendix E** to this Draft Initial Study.

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 Resource Code section 5020.1(k)?

Less Than Significant Impact.

A project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.[122] Section 5020.1 of the PRC defines a historical resource as including, but is not limited to, any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. The Tribe must respond in writing within 30 days of the City's AB 52 notice. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who might have knowledge of the religious and/or cultural significance of resources that may be in and near the Project site. An informational

[122] *California Public Resources Code Section 21084.1*

letter was mailed to a total of ten (10) Tribes known to have resources in this area, on December 5, 2016, describing the Project and requesting any information regarding resources that may exist on or near the Project site. No responses were received from any Tribal Representatives.

The Project Site is currently vacant and does not contain any site, building, or structure listed as a Los Angeles Historic-Cultural Monument (HCM).[123] The Project Site is not located in a City of Los Angeles Historic Preservation Overlay Zone, nor is it identified in Survey LA or Historic Places LA listings. A records search completed by the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System (CHRIS) dated December 22, 2017 included a review of all recorded archaeological and built-environment resources as well as a review of cultural resource reports on file. In addition, the California Points of Historical Interest (SPHI), the California Historical Landmarks (SHL), the California Register of Historical Resources (CAL REG), the National Register of Historic Places (NRHP), the California State Historic Properties Directory (HPD), and the City of Los Angeles Historic-Cultural Monuments (LAHCM) listings were reviewed for the Project Site. The CHRIS records indicate the project site is located within a ½-mile radius of several known archaeological sites, however no resources were identified on the subject site. A Cultural Resources Evaluation Letter was subsequently prepared by ASM Affiliates dated January 4, 2019, to summarize the literature review and pedestrian archaeological survey. The technical report identified 26 previous reports and 8 resources within a 0.5-mile radius of the site, none of which were within 0.25-mile radius of the site, and that are prehistoric and historic in nature. The technical report concludes that no archaeological resources were identified within the project area. Lastly, a Sacred Lands File Search was conducted through the Native American Heritage Commission, which confirmed negative results in correspondence dated October 24, 2017. Thus the Proposed Project would not cause any substantial adverse change in the immediate surroundings such that the significance of the historical resource would be materially impaired and impacts would be less than significant. The copies of this correspondence and the results of these invitations for consultation included in the public record as **Appendix E**.

As such, the project would not be eligible for listing in any register for historical resources as defined in Public Resource Code section 5020.1(k). Impacts would be less than significant, and no mitigation would be required.

[123] *City of Los Angeles Department Of City Planning, Zoning/Property Info (ZIMAS), http://zimas.lacity.org/, accessed February 12, 2016.*

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?

Less Than Significant Impact. Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources (TCRs), as defined in PRC Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation of an MND or EIR on or after July 1, 2015. PRC Section 21084.2 now establishes that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a Proposed Project. That consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings for the administrative record.

Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition of a TCR. In brief, in order to be considered a TCR, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, State, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the State register of historic resources or City Designated Cultural Resource. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a Proposed Project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As previously discussed under **Section 5(b)**, the Project Site does not contain any known archaeological sites or archaeological survey areas. In addition, the project would comply with

the provisions of Sections 5097.98 and Section 21083.2 of the PRC, California Health and Safety Code Section 7050.5, and CEQA Guidelines Section 15064.5(e) which would protect any potential archaeological resources or human remains that are discovered during excavation.

Public Resources Code Section 21080.3.1 establishes a formal process for Lead Agencies to consult with California Native American Tribes to identify potential significant impacts to TCRs, as defined in PRC Section 21074.

The geographic area of the Project Site is not known to contain any TCRs. As previously discussed under Section **17(a)**, the Los Angeles DCP mailed notices to Native American tribes known to be traditionally and culturally affiliated with the project area on December 5, 2016, requesting that they respond within 30-days if they wished to open a formal consultation process with the City. No responses have been received from any Tribal Representatives.

As discussed under Section **17(a)**, the Project Site is currently vacant and does not contain any site, building, or structure listed as a Los Angeles Historic-Cultural Monument (HCM).[124] The Project Site is not located in a City of Los Angeles Historic Preservation Overlay Zone, nor is it identified in Survey LA or Historic Places LA listings. A records search completed by the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System (CHRIS) dated December 22, 2017 included a review of all recorded archaeological and built-environment resources as well as a review of cultural resource reports on file. In addition, the California Points of Historical Interest (SPHI), the California Historical Landmarks (SHL), the California Register of Historical Resources (CAL REG), the National Register of Historic Places (NRHP), the California State Historic Properties Directory (HPD), and the City of Los Angeles Historic-Cultural Monuments (LAHCM) listings were reviewed for the Project Site. The CHRIS records indicate the project site is located within a ½-mile radius of several known archaeological sites, however no resources were identified on the subject site. A Cultural Resources Evaluation Letter was subsequently prepared by ASM Affiliates dated January 4, 2019, to summarize the literature review and pedestrian archaeological survey. The technical report identified 26 previous reports and 8 resources within a 0.5-mile radius of the site, none of which were within 0.25-mile radius of the site, and that are prehistoric and historic in nature. The technical report concludes that no archaeological resources were identified within the project area. Lastly, a Sacred Lands File Search was conducted through the Native American Heritage Commission, which confirmed negative results in correspondence dated October 24, 2017. Thus the Proposed Project would not cause any substantial adverse change in the immediate surroundings such that the significance of the historical resource would be materially impaired and impacts would be

[124] *City of Los Angeles Department Of City Planning, Zoning/Property Info (ZIMAS), http://zimas.lacity.org/, accessed February 12, 2016.*

less than significant. The copies of this correspondence and the results of these invitations for consultation included in the public record as **Appendix E**. With the completion of the outreach to the tribes for consultation, impacts would be less than significant, and no other mitigation would be required.

18. UTILITIES AND SERVICE SYSTEMS

This section is based on the information provided by the City of Los Angeles Bureau of Sanitation in an Inter-Departmental Correspondence memorandum dated July 31, 2018. The memorandum is incorporated herein by this reference, and provided in **Appendix F** to this Draft Initial Study.

Would the project:

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

Less than significant impact. A significant impact would occur if the proposed project would exceed wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board (LARWQCB). Wastewater generated in the City is treated at the Hyperion Treatment Plant in Playa del Rey. The Regional Water Quality Control Board RWQCB) regulates the treatment of wastewater at treatment plants and the discharge of the treated wastewater into receiving waters. The Hyperion Treatment Plant is responsible for adhering to RWQCB regulations as they apply to wastewater generated by the Proposed Project. Operation of the Proposed Project could increase the amount of wastewater that would need to be treated at the Hyperion Treatment Plant.

Wastewater reclamation plants that comprise the Hyperion Service Area has a total design capacity of 580 million gallons of wastewater per day (MGD). The City of Los Angeles Integrated Resources Plan indicates by the year 2020, projected wastewater flows will increase 16 percent to total approximately 531 MGD.[125] Based on current design capacity of the Hyperion Service Area wastewater reclamation plants, the Bureau would have ample capacity in the current wastewater treatment system.

On average, the Proposed Project would generate an average daily flow of approximately 48,193 GPD, as shown in **Table IV-46, Projected Wastewater Discharges for the Proposed Project.**[126]

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[125] City of Los Angeles, Department of Public Works, Bureau of Sanitation, Integrated Resources Plan Executive Summary, December 2006, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdew/~edisp/cnt010372.pdf

[126] City of Los Angeles Bureau of Sanitation, Wastewater Service Information correspondence, July 31, 2018, included as Appendix F to this Initial Study.

Table IV-46
Projected Wastewater Discharges for the Proposed Project

Land Use	Size	Generation Rates (GPD)	Total Wastewater Generation (GPD)
Studio	40 DU	75 GPD/DU	3,000
1-BDRM	111 DU	140 GPD/DU	15,540
2-BDRMS	81 DU	185 GPD/DU	14,985
3-BDRMS	4 DU	230 GPD/DU	920
Swimming Pool	1,498.52 CU. FT	7.48 GAL/CU. FT	11,209
Theater	30 SEATS	3/SEATS	90
Gymnasium	1100 SQ. FT	200 GPD/1000 SQ. FT	220
Lobby	44,585 SQ. FT	50 GPD/1000 SQ. FT	2,229
Total			**48,193**

Source: Ali Poosti, LA Sanitation Wastewater Engineering Services Division, 2018, and Impact Sciences, 2018
Sq. ft. – square feet
du = dwelling unit

Currently, the Hyperion Water Plant has a capacity of 450 MGD. On average, the Hyperion Water Plant receives a flow of 275 MGD, thus resulting in available capacity of 175 MGD.[127] The net increase of 48,193 GPD from the Proposed Project would not significantly impact the Hyperion Water Plant. All wastewater from the project would be treated according to requirements of the NPDES permit authorized by the LARWQCB. Impacts would be less than significant related to wastewater treatment requirements, and no mitigation would be required.

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?

Less than significant impact. A significant impact would occur if the proposed project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded. The City of Los Angeles Department of Water and Power (LADWP) conducts water planning based on forecast population growth. The addition of 236 units as a result of the proposed project would be consistent with Citywide growth, and, therefore, the project demand for water is not anticipated to require new water supply entitlements and/or require the expansion of existing or construction

[127] County of Los Angeles Department of Public Works, LA Sanitation website, Hyperion Water Reclamation Plant, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=hy5nte6s8_4&_afrLoop=30433509942992750#!, accessed July 15, 2015

of new water treatment facilities beyond those already considered in the LADWP 2015 Urban Water Management Plan (UWMP). LADWP will provide water service to the Project Site. Water is conveyed to users in the project area along several circulating water mains of varying sizes. The Proposed Project would be required to connect to existing mains around the project area. As discussed above in **Section 18(a),** wastewater generated on the Project Site would be treated at the Hyperion Treatment Plant.

The LADWP Urban Water Management Plan provides historical and forecasted water demands for the City of Los Angeles. Total water demand varies annually and is contingent on various factors including: population growth, weather, water conservation, drought, and economic activity. **Table IV-47, Historical Water Demand for LADWP's Service Area** shows the previous breakdown of average water use by from 2001.

Table IV-47
Historical Water Demand for LADWP's Service Area

Fiscal Year	Single Family	Multi-Family	Commercial	Industrial	Government	Non-Revenue	Total
2011-2014	209,651	165,364	98,994	17,663	42,543	32,774	566,990
2006-2010	236,154	180,277	106,964	23,196	42,956	30,617	620,165
2001-2005	239,754	190,646	109,685	21,931	41,888	52,724	656,628
1996-2000	222,748	191,819	111,051	23,560	39,421	33,696	622,295
1991-1995	197,322	177,104	110,724	21,313	38,426	39,364	584,253
24-Year Average	221,126	181,042	107,484	21,533	41,047	39,100	611,331

All units, except those in the Fiscal Year column, are in acre feet.
Source: Los Angeles Department of Water and Power, Urban Water Management Plan 2015, Exhibit ES-F

By analyzing historical demand, LADWP has forecasted water supply and demand projections in five year increments for each of the major categories of water uses. The point of forecasting water demand is to allow LADWP to better understand trends in water use, develop effective conservation programs, and invest appropriately in water supply development projects. The Urban Water Management Plan expects adequate water supplies would be able to their service area under normal, single-dry, and multi-dry year conditions through the year of 2035.

As shown in **Table IV-48, Projected Water Demand for the Proposed Project**, at build-out the Proposed Project would require approximately 57,831 gallons of water per day. The methodology to arrive at this amount is consistent with LADWP sewage generation rates established by the City of Los Angeles Bureau of Sanitation for expected wastewater demand, then extrapolating

using guidance from the L.A. CEQA Thresholds Guide 2006, Exhibit M.2-12, in which water consumption is assumed to be 120 percent of wastewater generation.

Table IV-48
Project Estimated Water Demand

Land Use	Size	Generation Rates (GPD)	Total Wastewater Generation (GPD)
Studio	40 DU	90 GPD/DU	3,600
1-BDRM	111 DU	168 GPD/DU	18,648
2-BDRMS	81 DU	222 GPD/DU	17,982
3-BDRMS	4 DU	276 GPD/DU	1,104
Swimming Pool	1,498.52 CU. FT	8.976 GAL/CU. FT	13,450.8
Theater	30 SEATS	3.6/SEATS	108
Gymnasium	1100 SQ. FT	240 GPD/1000 SQ. FT	264
Lobby	44,585 SQ. FT	60 GPD/1000 SQ. FT	2,674.8
Total			**57,831.6**

Source: LA Sanitation Wastewater Engineering Services Division, consistent with the City of L.A. CEQA Thresholds Guide 2006, Exhibit M.2-12, water consumption is assumed to be 120 % of wastewater generation.
Sq. ft. – square feet
du = dwelling unit

Based on the 2015 UWMP water demand projections through 2040, projected water demand for the City would be met with adequate supply under average weather conditions through the year of 2040 and intervening years (i.e., when the Proposed Project would be completed). The Project would result in an estimated net increase in water demand of approximately 64 acre-feet per year, which would comprise approximately 0.009 percent of the water demand for the City in 2020.

Prior to any construction activities, the project applicant would be required to coordinate with the City of Los Angeles Bureau of Sanitation (BOS) to determine the exact wastewater conveyance requirements of the proposed project, and any upgrades to the wastewater lines in the vicinity of the project site that are needed to adequately serve the proposed project would be undertaken as part of the project.

The project would not significantly affect existing on-site water and wastewater lines and/or off-site wastewater and water facilities. Implementation of the current requirements of CALGreen and the LA Green Building Code would further reduce water use and wastewater generation. Therefore, the proposed project would have a less-than-significant impact related to water or wastewater infrastructure. No mitigation is required.

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?

Less Than Significant Impact. A significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a Project Site, requiring the construction of new stormwater drainage facilities.

As described in Section **9(e)**, the Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns.

Prior to bridge construction, runoff from the site and any dewatering will be collected and treated per the appropriate construction Best Management Practices. The treated runoff will then be pumped, via a temporary surface pipe or hose, to the existing storm drain in Centinela Avenue. The pipe or hose will be set along the northerly edge of the existing service road along the north side of Centinela Creek. The distance to the existing storm drain is on the order of 3000 feet. The flowrate and pressure needed to overcome this distance suggests the use of large temporary pumps.

After bridge construction, a permanent pump station will be constructed with a force main attached to the upstream side of the bridge and continuing toward Beethoven Street. Flowing toward Centinela Creek in Beethoven Avenue is an existing 66-inch storm drain constructed under plan D-21505. The force main will empty in to this storm drain at a point acceptable to the City of Los Angeles. Additional property BMP's will be constructed per the City of Los Angeles's MS4 permit. At this time a pretreatment device, such as a CDS unit, and large cisterns to capture and use the rain water for irrigation are the proposed permanent BMPs.

Prior to any construction activities, the project applicant would be required to coordinate with the City of Los Angeles Bureau of Sanitation (BOS) to determine the exact storm drain requirements of the proposed project, and any upgrades to the storm drain lines in the vicinity of the project site that are needed to adequately serve the proposed project would be undertaken as part of the project. During the project's construction phase, the Project Applicant would be required to prepare and implement a SWPPP, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during project construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage,

minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City of BOE for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Therefore, through compliance with NPDES requirements and City grading regulations, project construction impacts related to stormwater discharge would be less than significant, and no further analysis of this issue is required.

During the project's operational phase, in accordance with the City's LID Ordinance, the Project Applicant would be required to incorporate appropriate stormwater pollution control measures into the design plans and submit these plans to the City's Department of Public Works, Bureau of Sanitation, Watershed Protection Division (WPD) for review and approval. Upon satisfaction that all stormwater requirements have been met, WPD staff would stamp the plan approved. Through compliance with the City's LID Ordinance, the project would meet the City's water quality standards. Therefore, project impacts related to operational stormwater discharges would be less than significant, and no further analysis is required.

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

Less than Significant Impact. Water supply to the Project Site is provided by the LADWP.[128] Buildout of the Proposed Project would create an increase in demand for water supplies compared to existing conditions on the Project Site. But as mentioned in **18(b),** there would be sufficient capacity in water supply to be able to accommodate the Proposed Project without new or expanded entitlements. Impacts would be less than significant, and no further analysis is required.

e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less than Significant Impact. See **Response 17(a)** and **17(b)**, above.

[128] *Includes imported water.*

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

Less than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Based on the *L.A. CEQA Thresholds Guide,* the determination of whether a project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the City's Source Reduction and Recycling Element (SRRE) or its updates, the Storm Water Management Program Plan (SWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. The Los Angeles Bureau of Sanitation (BOS) and private waste management companies are responsible for the collection, disposal, and recycling of solid waste within the City, including the project site. Solid waste during the operation of the proposed project is anticipated to be collected by the BOS and private waste haulers, respectively. Solid waste transported by both public and private haulers is recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. Within the City of Los Angeles, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill serve existing land uses within the City.

Under the City's RENEW LA Plan, adopted in February 2006, the City committed to reaching Zero Waste. The goal of Zero Waste as defined by the RENEW LA Plan is to reduce, reuse, recycle, or convert the resources currently going to disposal so as to achieve an overall diversion rate of 90 percent or more by the year 2025 and becoming a Zero Waste city by 2030. State law (AB 341) currently requires at least 50 Percent solid waste diversion and establishes a state-wide goal of not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020. As of 2012 the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.[129]

Moreover, State law requires mandatory commercial recycling in all businesses and multi-family complexes and imposes additional reporting requirements on local agencies, including the City

[129] *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013.*

of Los Angeles. In order to meet these requirements and goals, the City has established an exclusive, competitive franchise system for the collection, transportation and processing of commercial and multifamily solid waste that will aid the City in meeting its diversion goals by, among other things: (i) requiring franchisees to meet diversion targets; (ii) increasing the capacity for partnership between the City and solid waste haulers; (iii) allowing the City to establish consistent methods for diversion of recyclables and organics; (iv) increasing the City's ability to track diversion, which will enable required reporting and monitoring of state mandated commercial and multi-family recycling; (v) increasing the City's ability to ensure diversion quality in the processing facilities handling its waste and recyclables; and (vi) increasing the City's capacity to enforce compliance with federal, state, county, and local standards.

Within the City of Los Angeles, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill serve existing land uses within the City. Both landfills accept residential, commercial, and construction waste. The Sunshine Canyon Landfill is jointly operated by the City and the County, has a remaining capacity of 72.6 million tons. The Sunshine Canyon Landfill has an estimated remaining life of 22 years. An expansion of the Chiquita Canyon Landfill was recently approved by the Los Angeles County Board of Supervisors which will boost the daily disposal tonnage from 6,000 to 12,000 tons, the weekly disposal tonnage from 30,000 to 60,000 tons and the maximum amount of tonnage from 23 million to 60 million tons, extending the estimated remaining life of the landfill to 30 years.[130]

The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. Under the requirements of the hauler's AB 939 Compliance Permit from the Bureau of Sanitation, all construction and demolition debris would be delivered to a Certified Construction and Demolition Waste Processing Facility. Debris from demolition of any asphalt surface parking located on the Project Site would be recycled/recovered and would not be deposited in area landfills. As summarized in **Table IV-49**, below, it is estimated that approximately 569.95 tons of solid waste would be generated by the Project's construction activities. This represents a tiny fraction of the Sunshine Canyon Landfill's existing remaining disposal capacity of 72.6 million tons. Moreover, as of January 1, 2011 all contractors operating within the City of Los Angeles are required to source separate materials on site for recycling and/or use a permitted private waste hauler to deliver mixed materials to a certified processor for recycling. Thus, only a fraction of the construction and demolition debris would end up in regional landfills.

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130 *http://www.waste360.com/design-and-construction/waste-connections-chiquita-canyon-landfill-battle-explained*

Table IV-49
Estimated Construction Solid Waste Generation

Land Use	Size	Generation Rates (lbs/sf)[a]	Total Waste Generation (tons)
Multi-family units	236 du/198,793 sf	4.38	435.36
Non-residential	175,293 sf	4.02	352.34
Parking	175,220 sf	4.02	352.19
Total			**1,139.89**
Total with 50 percent recycling			**569.95**

Notes:
a – U.S. EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-4, June 1998. Construction debris is based on gross building area and thus exceeds the buildable floor area for purposes of calculating FAR.
Lbs = pounds
sf – square feet
du = dwelling unit
Source: Impact Sciences, 2018.

At buildout, the Proposed Project would generate approximately 944 pounds of waste per day or approximately 172.28 tons of solid waste per year as shown in **Table IV-50, Projected Daily Solid Waste Generation.** According to the 2015 Los Angeles County Integrated Waste Management Plan (IWMP), the total remaining capacity of the landfills is approximately 114 million tons.[131] The 86.14 tons per year generated during operation of the Proposed Project (not including the 50 percent diversion rate) would represent 0.00008 percent of the remaining capacity at the landfills which currently accept solid waste from the city. Therefore, the residential uses associated with the Proposed Project would not result in a significant impact towards landfill capacity. The proposed project would also comply with all federal, State, and local regulations related to solid waste. Impacts would be less than significant related to solid waste, and no further analysis is required.

Table IV-50
Projected Daily Solid Waste Generation

Land Use	Size	Generation Rates (lbs/day)	Total Waste Generation (lbs/day)	Total Waste Generation (tons/year)
Multi-family units	236 du	4 lbs/dwelling unit/day	944.0	172.28
Total			944.0	172.28
Total with 50 percent recycling			472.0	86.14

131 *County of Los Angeles, Department of Public Works, 2015 Annual Report, Los Angeles County Wide 1ntegrated Waste Management Plan, December 2016.*

Land Use	Size	Generation Rates (lbs/day)	Total Waste Generation (lbs/day)	Total Waste Generation (tons/year)

Source: CalRecycle Estimated Solid Waste Generation Rates for Commercial, Service, and Residential uses, http://www.calrecycle.ca.gov/wastechar/wastegenrates/Service.htm, accessed June 21, 2017.
Notes:
du = dwelling unit
Source: Impact Sciences, 2017.

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

Less than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The California Integrated Waste Management Act of 1989 (AB 939) was the first recycling legislation in the country to mandate recycling diversion goals. AB 939 required all California cities, counties and approved regional solid waste management agencies responsible to enact plans and programs to reduce waste disposal. Jurisdictions were required to meet diversion goals of 50 percent by the year 2000 and a statewide goal of 75 percent by 2020. In 2007, the City of Los Angeles initiated a Solid Waste Integrated Resource Plan (SWIRP) with goals of moving toward zero waste by 2030. Under the City's RENEW LA Plan, the City committed to reaching Zero Waste by diverting 70 percent of the solid waste generated in the City by 2013, diverting 90 percent by 2025, and becoming a zero waste city by 2030. As reported by the Bureau of Sanitation in 2009, the City had achieved a waste diversion rate of 65 percent. The City is exceeding the state-mandated diversion goal of 50 percent by 2000 set by the California Integrated Waste Management Act (AB 939) of 1989.[132] The Proposed Project would be required to comply with all applicable regulations regarding solid waste disposal. The Proposed Project's potential impacts associated with federal, state, and local statutes and regulations related to solid waste would be less than significant, and no further analysis is required.

[132] *City of Los Angeles Department of Public Works Bureau of Sanitation, Overview of Services for FY 2005/06, updated June, 14 2005.*

19. MANDATORY FINDINGS OF SIGNIFICANCE

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

Less Than Significant Impact. As discussed in **Section 4, Biological Resources,** the project would not impact any endangered fauna or flora. Further, because of the developed nature of the Project Site and the surrounding area, construction and operation of the Proposed Project would not impact the habitat or population of the Project Site and the surrounding area, the project would not impact the habitat or population level of fish or wildlife species, nor would it threaten a plant or animal community, nor impact the range of a rare endangered plant or animal.

As discussed in **Section 5, Cultural Resources** potential impacts related archaeological and paleontological resources would be less than significant following the implementation of the regulatory compliance measures, and no further analysis is required.

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)?

No Impact. Based on the proceeding discussions, no significant impacts were identified for the 18 environmental factors analyzed above. As the Proposed Project would not result in any unmitigated significant impacts, there would be no cumulative impacts. No impact would occur and no further analysis is required.

c) Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. As identified throughout the analysis, the Proposed Project would not have an environmental effect that would cause substantial adverse effects on human beings directly or indirectly. Impacts would be less than significant and no further analysis is required.

20. ENERGY

The following section evaluates potential impacts associated with the consumption of energy that would result from the implementation of the Proposed Project. The section generally follows the guidance for the evaluation of energy impacts provided in Appendix F, Energy Conservation, of the *State CEQA Guidelines*.

REGULATORY FRAMEWORK

Federal Laws, Regulations, and Programs

Energy Independence and Security Act

In December 2007, the President signed the Energy Independence and Security Act of 2007, which sets a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022. The Act also sets a national fuel economy standard of 35 miles per gallon (mpg) by 2020. The Act contains provisions for energy efficiency in lighting and appliances and for green building technology implementation in federal buildings. On July 11, 2008, the US EPA issued an Advanced Notice of Proposed Rulemaking (ANPRM) on regulating GHGs under the Clean Air Act (CAA). The ANPRM reviews the various CAA provisions that may be applicable to the regulation of GHGs and presents potential regulatory approaches and technologies for reducing GHG emissions. On April 10, 2009, the US EPA published the Proposed Mandatory Greenhouse Gas Reporting Rule in the *Federal Register* (US EPA 2009). The rule was adopted on September 22, 2009 and covers approximately 10,000 facilities nationwide that account for 85 percent of US GHG emissions.

On September 15, 2009, the US EPA and the US Department of Transportation's (DOT) National Highway Traffic Safety Administration (NHTSA) jointly established a national program that set new standards to reduce GHG emissions and improve fuel economy; these standards apply to model year 2012 through 2016 light-duty vehicles. The proposed standards would be phased in and would require passenger cars and light-duty trucks to comply with a declining emissions standard. In 2012, passenger cars and light-duty trucks had to meet an average standard of 295 grams of CO_2 per mile and 30.1 mpg. By 2016, the vehicles would have to meet an average standard of 250 grams of CO_2 per mile and 35.5 mpg.[133] The US EPA and US DOT formally adopted these standards on April 1, 2010.

[133] *The CO_2 emission standards and fuel economy standards stated are based on US EPA formulas.*

Energy Policy and Conservation Act

Enacted in 1975, this legislation established fuel economy standards for new light-duty vehicles sold in the US. The law placed responsibility on the National Highway Traffic and Safety Administration (a part of the US DOT) for establishing and regularly updating vehicle standards. The US EPA administers the Corporate Average Fuel Economy (CAFE) program, which determines vehicle manufacturers' compliance with existing fuel economy standards. Since the inception of the CAFE program, the average fuel economy for new light-duty vehicles (autos, pickups, vans, and SUVs) steadily increased from 13.1 mpg for the 1975 model year to 27.5 mpg for the 2012 model year and is proposed to increase to 54.5 mpg by 2025.

Energy Star Program

In 1992, the US EPA introduced Energy Star as a voluntary labeling program designed to identify and promote energy-efficient products to reduce greenhouse gas emissions. The program applies to major household appliances, lighting, computers, and building components such as windows, doors, roofs, and heating and cooling systems. Under this program, appliances that meet specifications for maximum energy use established under the program are certified to display the Energy Star label. In 1996, US EPA joined with the US Department of Energy to expand the program, which now also includes qualifying commercial, industrial, and residential buildings.

State Laws, Regulations, and Programs

Title 24

Title 24, Part 6, of the California Code of Regulations contains the CEC's Energy Efficiency Standards for Residential and Nonresidential Buildings. Title 24 was first established in 1978, in response to a legislative mandate to reduce California's energy consumption. Since that time, Title 24 has been updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.

On April 23, 2008, the CEC adopted the 2008 standards, which applied to projects that submitted an application for a building permit on or after January 1, 2010. The CEC adopted the 2008 standards for a number of reasons: (1) to provide California with an adequate, reasonably priced, and environmentally sound supply of energy; (2) to respond to Assembly Bill 32 (AB 32; the Global Warming Solutions Act of 2006), which requires California to reduce its greenhouse gas emissions to 1990 levels by 2020; (3) to pursue the statewide policy that energy efficiency is the resource of choice for meeting California's energy needs; (4) to act on the findings of California's

Integrated Energy Policy Report, which indicate that the 2008 Standards are the most cost-effective means to achieve energy efficiency, reduce the energy demand associated with water supply, and reduce greenhouse gas emissions; (5) to meet the West Coast Governors' Global Warming Initiative commitment to include aggressive energy efficiency measures in the update of all state building codes; and (6) to meet the Executive Order in the Green Building Initiative to improve the energy efficiency of nonresidential buildings through aggressive standards.[134] In 2013, updates were made to the 2008 Title 24 standards (effective January 1, 2014).

The California Green Building Standards Code, which is Part 11 of the Title 24 Building Standards Code, is commonly referred to as the CALGreen Code. The 2008 edition, the first edition of the CALGreen Code, contained only voluntary standards. The 2013 CALGreen Code is a code with mandatory requirements for new residential and nonresidential buildings (including buildings for retail, office, public schools, and hospitals) throughout California beginning on January 1, 2014. The 2013 CALGreen Code contains requirements for construction site selection, stormwater control during construction, construction solid waste reduction, indoor water use reduction, building material selection, natural resource conservation, site irrigation conservation, and more. Additionally, this code encourages buildings to achieve exemplary performance in the area of energy efficiency. For the purposes of energy efficiency standards, the CEC believes a green building should achieve at least a 15 percent reduction in energy usage when compared to California's mandatory energy efficiency standards.

AB 32, Executive Order S-3-05, and Executive Order B-30-15

In addition to Title 24, AB 32, Executive Order S-3-05, and Executive Order B-30-15 are anticipated to result in the future regulation of energy resources in California. (See **Section 4.6, Greenhouse Gas Emissions,** for additional information on AB 32 and the two executive orders.) In order to achieve the GHG emission reductions targeted under AB 32 and the two executive orders, it is generally accepted that California will need to improve its overall energy efficiency, in addition to the use of more renewable energy resources. Pursuant to AB 32, the California Air Resources Board (CARB) is working with other state agencies (including the CEC), to implement feasible programs and regulations that reduce emissions and improve energy efficiency.[135]

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134 See http://www.energy.ca.gov/title24/2008standards/index.html, 2013.

135 See http://www.arb.ca.gov/cc/ghgsectors/ghgsectors.htm#electric, September 13, 2013 (highlights targeted improvements for the energy sector).

Renewable Portfolio Standard

Established in 2002 under SB 1078, accelerated in 2006 under SB 107, and expanded in 2011 under SB 2, California's Renewables Portfolio Standard (RPS) is one of the most ambitious renewable energy standards in the country. The RPS program requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020.

Senate Bill 350

Senate Bill 350 (SB 350) was signed into law in 2015. The legislation requires that, by 2030, 50 percent of all electricity provided by power plants in California must be from renewable sources. SB 350 further requires the CEC to establish annual targets for statewide energy efficiency savings and demand reduction that would achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas by retail customers by 2030. The bill requires the state Public Utilities Commission to establish efficiency targets for investor-owned electrical and gas corporations consistent with the 2030 goal, and the CEC to establish annual targets for energy efficiency savings and demand reductions for local publicly-owned electric utilities consistent with the 2030 goal. Each retailer of electricity must regularly file an integrated resource plan (IRP) for review and approval.

Other Energy Related Statutes and Executive Orders

Additional legislations and executive orders focused on energy efficiency in California are summarized briefly below:

- Assembly Bill 1613: This legislation, also known as the Waste Heat and Carbon Emissions Reduction Act, was designed to encourage the development of new combined heat and power systems in California with a generating capacity of up to 20 MW.
- Senate Bill 1: This legislation enacted the Governor's Million Solar Roofs program and has an overall objective of installing 3,000 MW of solar photovoltaic systems.
- Senate Bill 1389: This legislation requires the CEC to prepare a biennial integrated energy policy report that contains an assessment of major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors. It also requires the CEC to provide policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety.

- Executive Order S-14-08: This order established accelerated RPS targets—specifically 33 percent by 2020.
- Executive Order S-21-09: This order requires CARB to adopt regulations, by July 31, 2010, increasing California's RPS to 33 percent by 2020.

Local Laws, Regulations, and Programs

Los Angeles Green Building Code

The City of Los Angeles implemented Ordinance No. 184,691 as the most recent update to the Los Angeles Green Building Code (LA Green Building Code). The LA Green Building Code is based on the 2016 *CAL*Green code as discussed above. The following types of projects are subject to the LA Green Building Code:

- All new buildings (residential and non-residential)
- All additions (residential and non-residential)
- Alterations with building valuations over $200,000 (residential and non-residential)

Specific measures to be incorporated into the Proposed Project to the extent feasible could include, but are not limited to:

- Recycling of asphalt, concrete, metal, wood and cardboard waste generated during demolition and construction;
- Installation of a "cool roof" that reflects the sun's heat and reduces urban heat island effect;
- Use of recycled construction materials, including recycled steel framing, crushed-concrete sub-base in parking lots, fly ash-based concrete and recycled content in joists and joist girders when feasible;
- Use of locally (within 500 miles) manufactured construction materials, where possible;
- Central tracking of waste compactor loads, ensuring that compactors are full thereby reducing trips to landfills;
- Use of energy efficient lighting;

- Use of ENERGY STAR(®)[136] appliances in residential units;
- Use of high energy efficiency rooftop heating and conditioning systems;
- 15 percent of the roof area set aside for future solar panels;
- Use of ultra-low-flow toilets and low-flow metered hand-wash faucets in public facilities;
- Use of smart irrigation systems to avoid over-watering of landscape;
- Use of indigenous and/or water-appropriate plants in landscaping; and
- Use of low-impact development measures using innovative design to filter and infiltrate stormwater runoff and reduce water sent to stormdrain systems.
- Provision of electric vehicle charging stations in the parking structure; 5 percent of total spaces would be designated for low emitting, fuel efficient and carpool/van pool vehicles.

Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. A significant impact would occur if the Proposed Project results in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. The Proposed Project would develop a vacant site with a 6-story multi-family residential building. The Proposed Project is required to comply with the energy conservation standards established in Title 24 of the California Administrative Code. California's Energy Efficiency Standards located at Title 24, Part 6, Sections 120.0 to 120.9 and 130.0 to 141.0 of the California Code of Regulations and commonly referred to as "Title 24," which was established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The 2016 Standards will continue to improve upon the 2013 Standards for new construction

136 *The ENERGY STAR program, developed by the US Environmental Protection Agency in 1992, is a voluntary measure intended to reduce energy consumption and improve energy efficiency, which has resulted in appliance companies, car companies, home builders, and more stepping in to create and promote more energy efficient products. For products to be designated as ENERGY STAR they must be certified by an independent third-party to provide increased energy efficiency. If the product costs more than a similar non-ENERGY STAR product the purchaser must be able to recoup their investment through utility savings.*

of, and additions and alterations to, residential and nonresidential buildings. The effective date of the 2016 Standards is January 1, 2017. The Energy Efficiency Standards are a specific response to the mandates of AB 32, (Health and Safety Code Sections 38500–38599), also known as the California Global Warming Solutions Act of 2006, and to pursue California energy policy that energy efficiency is the resource of first choice for meeting California's energy needs. The Proposed Project includes energy efficiency components to conserve energy, which are detailed below.

Electricity Supply

The Los Angeles Department of Water and Power (LADWP) provides electricity service to the Project site. The LADWP is the nation's largest municipal electric utility, and serves a 465-square-mile area in Los Angeles and much of the Owens Valley. The Power System supplies more than a 26 million megawatt-hours (MWh) of electricity a year for the City of Los Angeles 1.4 million residential and business customers.[137] Electrical service provided by the LADWP is divided into two planning districts: Valley and Metropolitan. The Valley Planning District includes the LADWP service area north of Mulholland Drive, and the Metropolitan Planning District includes the LADWP service area south of Mulholland Drive. The Project site is located within the LADWP Metropolitan Planning District.

In total, LADWP operates 21 receiving stations and 162 distribution stations to provide electricity to LADWP customers, with additional facilities to be acquired as their load increases. Power supply sources include: 20 percent from renewable energy sources, 22 percent from natural gas, 9 percent from nuclear, 2 percent from large hydro, 40 percent from coal, and 7 percent from other and unspecified sources. Typical residential energy use per customer is about 500 kilowatt-hours (kWh) per month. Business and industry consume about 70 percent of the electricity in Los Angeles, but residents constitute the largest number of customers.[138] Projected future demand growth for LADWP is less than 1 percent per year.

LADWP has a maximum plant capacity of 7200 megawatts. Historically, Los Angeles peak demand was 6.396 reached on September 16, 2014.

Power lines are located along the streets surrounding the Project site, including Beethoven Street. The Proposed Project would receive power by connecting the new buildings to the existing

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[137] LADWP, 2016 IRP, Executive Summary pg ES-1, https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=OPLADWPCCB562207&RevisionSelectionMethod=LatestReleased, accessed June 21, 2017

[138] Ibid.

easements and power lines surrounding the site.

Natural Gas

Natural gas is provided and distributed to residents and businesses in the City of Los Angeles by the Southern California Gas Company (SoCalGas). According to the 2016 California Gas Report, SoCalGas is expected to provide an average of 2,526,000 Kilo British Thermal Unit (kBtu) per day by 2021.[139] In addition, due to modest economic growth, energy efficiency standards and programs, renewable electricity goals and the decline in commercial and industrial demand, starting in 2013 and continuing through 2035, natural gas demands are projected to decline at an annual rate of 0.6 percent throughout the SoCalGas service area.[140]

SoCalGas purchases gas supplies on a daily, monthly, and longer-term basis from producers and marketers in California, Canada, the Rockies, and elsewhere in the U.S. Southwest. In 2012[141], natural gas was used in California to produce electricity (45.6 percent), in residential uses (20.8 percent), in industrial uses (14.5 percent), oil and gas industry operations (9.4 percent), in commercial uses and for transportation (8.6 percent), for agriculture (0.5 percent), and other unspecified uses (0.6 percent). The total natural gas usage in 2012 was 23,323 million therms.[142]

Petroleum Based Fuel

In 2016, it is estimated that 15.2 billion gallons of gasoline (non-diesel)[143] and 2.9 billion gallons of diesel fuel[144] were sold statewide. The estimated 2015 gasoline sales for Los Angeles County[145] were approximately 3.47 billion gallons, and 313 million gallons of diesel fuel.[146]

Construction

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139 *2016 California Gas Report, prepared by the California Gas and Electric Utilities, Table 1-SCG, website, https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, accessed June 21, 2017.*

140 Ibid. *2016 California Gas Report, prepared by the California Gas and Electric Utilities, pg. 64.*

141 *Note: 2012 figures are the most recent available.*

142 *California Energy Commission, Energy Almanac, Overview of Natural Gas in California, Natural Gas Supply. http://energyalmanac.ca.gov/naturalgas/overview.html, accessed June 21, 2017.*

143 *California Energy Commission, California Gasoline Data, Facts, and Statistics. http://www.boe.ca.gov/sptaxprog/reports/MVF_10_Year_Report.pdf, accessed June 21, 2017.*

144 *California Energy Commission, Diesel Fuel Data, Facts, and Statistics, http://www.boe.ca.gov/sptaxprog/reports/Diesel_10_Year_Report.pdf, accessed June 21, 2017.*

145 *Note: 2015 figures are the most recent available.*

146 *California Energy Commission, California Annual Retail Fuel Outlet Report Results (CEC-A15) Spreadsheets, http://www.energy.ca.gov/almanac/transportation_data/gasoline/2015_A15_Results.xlsx, accessed June 21, 2017.*

Project construction would require demolition, grading, utility installation, foundation construction, building construction, paving, and landscaping installation. All construction would be typical for the region and building type. During construction, energy would be consumed in the form of petroleum-based fuels (i.e., gasoline and diesel) used to power off-road construction vehicles and equipment on the Project site, for construction worker travel to and from the Project site, as well as for delivery truck trips; and to operate generators to provide temporary power for lighting and electronic equipment. The manufacturing of construction materials used by the Proposed Project would also involve energy use. Due to the large number of materials and manufacturers involved in the production of construction materials (including manufacturers in other states and countries), upstream energy use cannot be reasonably estimated. However, it is reasonable to assume that manufacturers of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. Furthermore, neither the City nor the applicant has control over or the ability to influence energy resource use by the manufacturers of construction materials. Therefore, this analysis does not evaluate upstream energy use.

The average annual and total consumption of gasoline and diesel fuel during Project construction was estimated using the same assumptions and factors from CalEEMod that were used in estimating construction air emissions in **Section 3, Air Quality**. As shown in **Table IV-51, Off-Road Bridge Construction Equipment Diesel Fuel Consumption** and **Table IV-52, Off-Road Site Construction Equipment Diesel Fuel Consumption**, and **Table IV-53, Bridge Construction Worker Gasoline Consumption** and **Table IV-54, Site Construction Worker Gasoline Consumption**, a total of approximately 2,270,560 gallons of diesel fuel, and 771,323,188 gallons of gasoline would be consumed over the Project's construction horizon, or approximately 1,135,280 gallons of diesel fuel, and 385,661,594 gallons of gasoline annually.

Table IV-51
Off-Road Bridge Construction Equipment Diesel Fuel Consumption

Phase	Equipment Type	Units	Hours	Horse Power	Load Factor	Number of Days	Fuel Usage Factor[a]	Diesel Usage[b]
Site Preparation Bridge	Bore/Drill Rigs	1	8	187	0.41	225	0.05	6,900
	Rubber Tired Loaders	2	8	97	0.37	225	0.05	6,460
	Graders	1	8	187	0.41	225	0.05	6,900
	Tractors/Loaders/Backhoes	2	8	97	0.37	225	0.05	6,460
Paving Bridge	Paving Equipment	1	6	9	0.56	25	0.05	38

Phase	Equipment Type	Units	Hours	Horse Power	Load Factor	Number of Days	Fuel Usage Factor[a]	Diesel Usage[b]
	Pavers	1	7	130	0.42	25	0.05	478
	Cement and Mortar Mixers	4	6	9	0.56	25	0.05	151
	Rollers	1	7	80	0.38	25	0.05	266
	Tractors/Loaders/Backhoes	1	7	97	0.37	25	0.05	314
Building Construction Bridge	Cranes	1	4	231	0.29	500	0.05	6,699
	Forklifts	1	6	89	0.20	500	0.05	2,670
	Tractors/Loaders/Backhoes	2	8	97	0.37	500	0.05	14,356
							Project Total	**51,692**

Source: CalEEMod Model Data; Impact Sciences, 2017
Notes:
a horsepower/gallon/hour
b in gallons

Table IV-52
Off-Road Site Construction Equipment Diesel Fuel Consumption

Phase	Equipment Type	Units	Hours	Horse Power	Load Factor	Number of Days	Fuel Usage Factor[a]	Diesel Usage[b]
Site Preparation	Graders	1	8	187	0.41	145	0.05	26,454
	Scrapers	1	8	367	0.48	145	0.05	10,217
	Tractors/Loaders/Backhoes	1	7	97	0.37	145	0.05	1,821
Grading	Graders	1	8	187	0.41	70	0.05	2,147
	Rubber Tired Dozers	1	8	247	0.40	70	0.05	2,766
	Tractor/ Loaders/Backhoes	2	7	97	0.37	70	0.05	1,759
Paving	Cement and Mortar Mixers	1	8	9	0.56	215	0.05	433
	Pavers	1	8	130	0.42	215	0.05	4,696
	Paving Equipment	1	8	132	0.36	215	0.05	4,087
	Rollers	2	8	80	0.38	215	0.05	5,229
	Tractors/Loaders/Backhoes	1	8	97	0.37	215	0.05	3,087
Building Construction Site	Cranes	1	8	231	0.29	1,960	0.05	52,520
	Forklifts	2	7	89	0.20	1,960	0.05	24,422
	Generator Sets	1	8	84	0.74	1,960	0.05	48,733
	Tractors/Loaders/Backhoes	1	6	97	0.37	1,960	0.05	21,103
	Welders	3	8	46	0.45	1,960	0.05	48,686
Architectural Coating	Air Compressors	1	6	78	0.48	215	0.05	2,415

Phase	Equipment Type	Units	Hours	Horse Power	Load Factor	Number of Days	Fuel Usage Factor[a]	Diesel Usage[b]
							Project Total	**211,842**

Source: CalEEMod Model Data; Impact Sciences, 2017
Notes:
a horsepower/gallon/hour
b in gallons

Table IV-53
Construction Bridge Worker Petroleum Fuel Consumption

Phase	Number of Daily Trips	Number of Days	Average Round-Trip Commute Distance (in miles)	Fuel Usage (ave mpg)[a]	Fuel Usage (in gallons)
Worker Trips (Gasoline)					
Site Preparation Bridge	90	225	14.7	18.6	5,536,755
Building Construction Bridge	60	500	14.7	18.6	8,202,600
Paving Bridge	120	25	14.7	18.6	820,260
				Total Gasoline Usage	**14,559,615**

Source: CalEEMod Model Data; Impact Sciences 2017
Notes:
ave – average mpg – miles per gallon
a This is a conservatively estimated total, as it assumes no electric, hybrid or other alternate fuel use vehicles in the fleet mix.
b There is no anticipated demolition or grading associated with bridge construction. Therefore, no anticipation of haul trips.

Table IV-54
Construction Site Worker Petroleum Fuel Consumption

Phase	Number of Daily Trips	Number of Days	Average Round-Trip Commute Distance (in miles)	Fuel Usage (ave mpg)[a]	Fuel Usage (in gallons)
Worker Trips (Gasoline)					
Site Preparation	90	145	14.7	18.6	3,568,131
Grading	40	70	14.7	18.6	765,576
Paving	90	215	14.7	18.6	5,290,677
Building Construction	1,390	1960	14.7	18.6	744,905,448
Architectural Coatings	34	215	14.7	18.6	1,998,700
				Total Gasoline Usage	**756,528,532**
Hauling Trips (Diesel)					
Site Preparation	3,929[b]	--	20	25.1	1,972,358
				Total Diesel Usage	**1,972,358**

Phase	Number of Daily Trips	Number of Days	Average Round-Trip Commute Distance (in miles)	Fuel Usage (ave mpg)[a]	Fuel Usage (in gallons)

Source: CalEEMod Model Data; Impact Sciences 2017
Notes:
ave – average mpg – miles per gallon
a This is a conservatively estimated total, as it assumes no electric, hybrid or other alternate fuel use vehicles in the fleet mix.
b Number of haul trips total for entire phase

The estimated amounts of energy resources reported in **Tables IV-51**, **IV-52** and **IV-53**, **IV-54** would be consumed over a period of three years (36 months) and would represent a small percentage of the total energy used in the state. More importantly, for reasons presented below, this consumption would not represent a wasteful and inefficient use of energy resources.

There is growing recognition among developers and retailers that sustainable construction is not any more expensive than "business as usual" construction methods, and further, that there are long-term significant cost-savings potential in utilizing green building practices and materials. In addition, the Proposed Project would feature a sustainable design to comply with CALGreen and LA Green Building Code, which would result in the use of sustainable materials and recycled content that would reduce energy consumption during Project construction. Construction materials would include recycled materials and products originating from nearby sources to the extent feasible in order to comply with CALGreen and to reduce costs of transportation.

Worker trips are estimated in **Tables IV-53**, and **IV-54** above. Worker trips are expected to vary by phase; however, trips would be temporary and would occur over the three year timeframe of construction activity. As these trips would be temporary, they would not be wasteful or inefficient use of energy. CARB has adopted Title 13 Section 2485, an Airborne Toxic Control Measure (ATCM), to limit diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other toxic air contaminants. All diesel-fueled commercial heavy- and medium-duty vehicles are required to comply with these measures. The ATCM requires that construction idling times shall be minimized either by shutting equipment off when not in use, or limiting the maximum idling time to five minutes. It also requires that all construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications, and that all equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. Idling restrictions and the use of newer engines and properly maintained equipment would result in less fuel combustion and energy consumption. Furthermore, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.

For the reasons listed above, the Proposed Project would not involve the inefficient, wasteful, and unnecessary use of energy during construction and the construction-phase impact related to energy consumption would be less than significant.

Operation

Electricity and Natural Gas

Title 24 represents the state policy on building energy efficiency. The goals of the Title 24 standards are to improve energy efficiency of residential and non-residential buildings, minimize impacts during peak energy-usage periods, and reduce impacts on state energy needs. The Proposed Project is required to comply with Title 24, and therefore would be energy efficient. Furthermore, the Proposed Project would include features to minimize energy consumption, many of which are mandated by CALGreen and the LA Green Building Code, which would further reduce the amount of electricity and natural gas consumed by the Proposed Project.

It is anticipated that LADWP and SoCalGas would be able to provide natural gas and electricity to the Project site using existing infrastructure. Only minor modifications to the distribution system would be required to connect the Proposed Project to the existing off-site electrical and natural gas systems. Further, the Project's demand for electricity by itself would not require the construction of new power generation facilities.

The Proposed Project is consistent with planning and growth projections for the City of Los Angeles, as discussed in **Section 13, Population and Housing**. The electrical loads and natural gas demand that would be required by the Proposed Project are within the parameters of projected load growth in the City, and LADWP and SoCalGas will be able to meet the demand in this area. Therefore, the Proposed Project would not result in the consumption of energy resources that could not be accommodated within the long-term electricity and natural gas supply and distribution system of LADWP.

Petroleum-Based Fuel

The Proposed Project would result in the consumption of petroleum-fuel related to vehicular travel (quantified as VMT) to and from the Project site. **Table IV-55, Estimated Petroleum-based Fuel Usage at Buildout**, below, presents the projected consumption of approximately 34,668 gallons of diesel and 235,041 gallons of gasoline per year, or a total of 269,709 gallons of petroleum-based fuels per year based on an annual estimate of 5,241,911 VMT obtained from the CalEEMod results for the Proposed Project.

This is a conservative estimate, given that it assumes no electric, hybrid, or other alternate fuel use vehicles in the fleet mix. Furthermore, this level of annual consumption is based on fuel efficiency rates (miles per gallon) shown in **Table IV-52**. Federal and state laws and regulations will continue to require further improvements in fuel efficiency in motor vehicles produced and/or sold in the US and total annual consumption of petroleum-based fuel is expected to decrease over time.

Table IV-55
Estimated Petroleum-based Fuel Usage at Project Buildout

Source	Fleet Mix[a]	Generation Factor[b, c]	Annual Consumption (in gallons)
Mobile			
Diesel (gallons)	16.6 %	870,157/25.1 mpg	34,668
Gasoline (gallons)	83.4 %	4,371,753/18.6 mpg	235,041
		Total	**269,709**

Source: Impact Sciences 2017
Notes:
mpg = miles per gallon
a Data Source: FHWA OHPI, Highway Statistics, Fuel Consumption by State and Type http://www.fhwa.dot.gov/policyinformation/pubs/hf/pl11028/chapter5.cfm
b Data Source: California Department of Transportation, 2007 California Motor Vehicle Stock, Travel and Fuel Forecast, http://www.energy.ca.gov/2008publications/CALTRANS-1000-2008-036/CALTRANS-1000-2008-036.PDF
c Diesel-powered vehicles typically get 30-35 % more miles per gallon than comparable vehicles powered by gasoline. US Department of Energy, Fuel Economy Guide, http://www.fueleconomy.gov/feg/pdfs/guides/FEG2013.pdf

As previously discussed, in 2016, it is estimated that 15.2 billion gallons of gasoline (non-diesel)[147] and 2.9 billion gallons of diesel fuel[148] were sold statewide. Thus, at buildout, the Proposed Project would represent less than 0.002 percent of the statewide annual gasoline consumption and less than 0.001 percent of the statewide annual diesel consumption.

For the reasons listed above, the Proposed Project would not involve the inefficient, wasteful, and unnecessary use of energy during operation and the operation-phase energy impact would be less than significant.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant Impact. A significant impact could occur if the Proposed Project has the potential to conflict with or obstruct a state or local plan for renewable energy or energy

147 147 *California Energy Commission, California Gasoline Data, Facts, and Statistics. http://www.boe.ca.gov/sptaxprog/reports/MVF_10_Year_Report.pdf, accessed June 21, 2017.*

148 *California Energy Commission, Diesel Fuel Data, Facts, and Statistics, http://www.boe.ca.gov/sptaxprog/reports/Diesel_10_Year_Report.pdf, accessed June 21, 2017.*

efficiency. With respect to renewable energy, all of the proposed Project's energy demands will be served by the City of Los Angeles Department of Water and Power (LADWP). Starting in 2017, the City's Power Integrated Resource Plan (IRP) was expanded into the Power Strategic Long-Term Resource Plan (SLTRP), which will increase the planning horizon, from 20 years, ending in 2037, through 2050, in order to better align with Statewide greenhouse gas emissions goals and align with Los Angeles' 100% clean energy initiative. The LADWP's 2017 Power Strategic Long-Term Resource Plan (2017 SLTRP) document serves as a comprehensive 20-year roadmap that guides the LADWP Power System in its efforts to supply reliable electricity in an environmental responsible and cost-effective manner. The goal of the 2017 SLTRP is to identify a portfolio of generation resources and Power System assets that meets the City's future energy needs at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. The 2017 SLTRP re-examines and expands its analysis on the 2016 IRP resource cases with updates in line with latest regulatory framework, and updates to case scenario assumptions that include a 65 percent Renewable Portfolio Standard (RPS), advanced energy efficiency, and higher levels of local solar, energy storage, and transportation electrification. As the Proposed Project would derive its electricity from the LADWP, the Proposed Project's energy demands will primarily be derived from renewable energy sources.

With respect to energy efficiency, the Project would be required to comply with the L.A. Green Building Code. The L.A. Green Building Code, effective January 1, 2017, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. Among many requirements, the Proposed Project will comply with the L.A. Green Building Code requirement that projects comply with the following requirements related to water efficiency, solid waste reduction, and electric vehicle supply equipment:

Solid Waste Reduction. L.A. Green Building Code Section 5.408.1 and LAMC Section 66.32 require the construction contractor to obtain an AB 939 Compliance Permit certifying the delivery of the construction and demolition waste to a certified construction and demolition waste processing facility. Diversion efforts would be accomplished through source reduction, recycling, and composting. Finally, the Proposed Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.

Water Conservation. As mandated by the L.A. Green Building Code, the Proposed Project would be required to provide separate submeters for individual leased, rented or other tenant spaces projected to consume more than 100 gallons per day and any building or addition that is projected

to consume more than 1,000 gallons per day. Plumbing fixtures would need to comply with one of the following: (1) a 20% reduction in the building's "water use baseline" as demonstrated in Table 5.303.2.2 of the Los Angeles Plumbing Code; or (2) comply with the maximum flow rates shown in Table 5.303.2.3 of the Plumbing Code. The Project would also be required to develop a water budget for landscape irrigation use and install automatic irrigation systems with weather or soil moisture-based controllers.

Electric Vehicle Supply Equipment. Pursuant to LAMC 99.05.106.5.3, at least five percent (5%) of the Code required parking stalls in nonresidential buildings shall be electric vehicle charging spaces (EV spaces) capable of supporting future electric vehicle supply equipment (EVSE). The incorporation of EVSE into the Proposed Project is consistent with State and City GHG policies to encourage and support alternative clean fuel supplies for vehicles and would further serve to reduce GHG emissions attributable to the vehicle trips generated by the Project.

Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant, and no mitigation measures are required.

UNAVOIDABLE ADVERSE EFFECTS

Appendix F of the State CEQA Guidelines recommends that the CEQA document report any unavoidable adverse impacts associated with the Project's energy use. The analysis presented above shows that the Proposed Project would not result in a significant unavoidable impact associated with the use of energy.

IRREVERSIBLE COMMITMENT OF RESOURCES

Appendix F states that an irreversible commitment of resources could occur if the project preempts future energy development or future energy conservation. The Proposed Project is a residential development that would not preempt future energy development on the Project site since there are no energy resources located on or near the site. The Proposed Project would also not preempt future energy conservation, because similar to other residents in the City, the Project site property owners would be able to implement energy efficiency improvements that become available in the future.

SHORT-TERM GAINS AND LONG-TERM IMPACTS

Appendix F suggests that the project's short-term gains and long-term impacts can be evaluated by calculating the project's energy cost over the project's lifetime. As noted above, the Proposed Project would not result in a wasteful use of energy. The Project would contribute to both market and affordable housing stock and 2014-2021 Regional Housing Needs Assessment obligations

that are needed to meet the City's housing needs. There would not be a reduction of long-term benefits for short-term gains as a result of the Proposed Project.

GROWTH INDUCING EFFECTS

Appendix F states that growth inducing effects may include the energy consumption of the growth induced by the project. As stated in Section **13**, Population and Housing, the Proposed Project would not induce any population or employment growth beyond what has been anticipated in the recent Southern California Association of Governments 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy and the Palms–Mar Vista–Del Rey Community Plan, and therefore there would be no energy consumption related to growth induced by the Proposed Project.

21. WILDFIRE

Would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. See response to Section 8(g). No further analysis is required.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. A potential significant impact upon wildfire hazards could occur if the Project Site were to be located on state responsibility areas or lands classified as very high fire hazard severity zones. Lands subject to this provision have been designated by the City of Los Angeles Fire Department pursuant to Government Code 51178 that were identified and recommended to local agencies by the Director of Forestry and Fire Protection based on criteria that includes fuel loading, slope, fire weather, and other relevant factors. These areas must comply with the Brush Clearance Requirements of the Fire Code. The Very High Fire Hazard Severity Zone (VHFHSZ) was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone." The Proposed Project Site is not located within a state responsibility area or land classified as a very high fire hazard severity zone. Therefore, this checklist question is not applicable to the Proposed Project and no impact would occur.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less Than Significant Impact. See response to Section 21(b). The project will require the extension of roads and infrastructure to serve the subject site, including a bridge for vehicular access through the form of a private driveway from an adjacent property, and sewer and storm drain lines, which is subject to standard building code requirements and regulatory compliance measures. Therefore, impacts will be less than significant. No further analysis is required.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less Than Significant Impact. See response to Section 6(d). No further analysis is required.

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VI. ACRONYMS AND ABBREVIATIONS

ATCS	Adaptive Traffic Control System
AQMP	Air Quality Management Plan
Basin	South Coast Air Basin
bgs	Below ground surface
BLS	Basic Life Support
BMPs	Best Management Practices
*CAL*Green	California Green Building Standards Code
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCTV	Closed circuit television
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CMA	Critical Movement Analysis
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	Carbon monoxide
CPA	Community Plan Area
dBA	A-weighted decibel
DOSH	California Division of Occupational Safety and Health
DRP	City of Los Angeles Department of Recreation and Parks
DWP	Department of Water and Power (see LADWP)
EV	Electric vehicle
FAR	Floor area ratio
FRA	Federal Railway Administration
gpd	Gallons per day
gsf	Gross square feet
HRA	Health Risk Assessment
HTP	Hyperion Treatment Plant
IS	Initial Study
LADBS	City of Los Angeles Department of Building and Safety
LADOT	City of Los Angeles Department of Transportation

LADWP	City of Los Angeles Department of Water and Power
LAFCD	County of Los Angeles Flood Control District
LAFD	City of Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	City of Los Angeles Police Department
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
lbs	Pounds
LEL	Lower Explosive Limit
LID	Low impact development
LOS	Level of Service
MEP	Maximum Extent Practicable
Metro	Los Angeles County Metropolitan Transportation Authority
MND	Mitigated Negative Declaration
MTA	Los Angeles County Metropolitan Transit Authority
NAHC	Native American Heritage Commission
NO_x	Nitrogen oxides
NPDES	National Pollution Discharge Elimination System
PM2.5	Fine Particulate Matter
PM10	Respirable Particulate Matter
ppm	Parts per million
PSI	Pounds per square inch
RHNA	Regional Housing Needs Assessment
RCPG	Regional Comprehensive Plan and Guide
ROG	Reactive organic gas
RWQCB	Regional Water Quality Control Board
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
sf	Square foot / feet
SO_x	Sulfur oxides
SPR	Site plan review
SR	State Route

SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	Stormwater Pollution Prevention Plan
TDM	Transportation demand management
UBC	Uniform Building Code
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
V/C	Volume to Capacity ratio