DEPARTMENT OF CITY PLANNING

APPEAL RECOMMENDATION REPORT

City Planning Commission

Date: July 27, 2017
Time: after 8:30 a.m.
Place: Van Nuys City Hall, Council Chamber
14410 Sylvan Street, 2nd Floor
Van Nuys, California 91401

Public Hearing: Yes
Appeal Status: Further Appealable to City Council
Expiration Date: August 7, 2017
Multiple Approval: No

Case No.: VTT-73891-1A
CEQA No.: ENV-2015-4087-MND
Incidental Cases: DIR-2015-4086-DB-CDO-SPR
Council No.: 11 - Bonin
Plan Area: Palms - Mar Vista - Del Rey
Specific Plan: West L.A. T.I.M.P., West Pico Boulevard Community Design Overlay
Certified NC: West Los Angeles

Existing GPLU: General Commercial
Existing Zones: [Q]C2-1VL-CDO & R3-1

Applicant: 11460 Gateway, LLC.
Representative: Dana Sayles, three6ixty

Appellants: Joseph Nguyen of St. Joan of Arc Church and neighbors from Colby and Butler Avenues

PROJECT LOCATION: 11460–11488 West Gateway Boulevard; 2426 South Colby Avenue and 2425 South Butler Avenue

PROPOSED PROJECT: The proposed project involves the demolition of the existing commercial structures and surface parking lots, and the construction, use and maintenance of a new, five-story 129-unit multi-family building, including 15 dwelling units set aside for Very Low Income Households, over a two-level subterranean garage providing 154 automobile parking spaces and 146 bicycle parking spaces.

APPEAL ACTION: Pursuant to Los Angeles Municipal Code (L.A.M.C.) Section 17.06, an appeal of the entire decision of the Advisory Agency's approval of Vesting Tentative Tract Map No. 73891 for a one-lot subdivision, including the merger and vacation of a public alley right-of-way to create 129 residential condominiums.

RECOMMENDED ACTIONS:

1. **Find**, based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in Mitigated Negative Declaration, No. ENV-2015-4087-MND, adopted on July 6, 2017; and pursuant to CEQA Guidelines, Sections 15162 and 15164, no subsequent EIR, negative declaration, or addendum is required for approval of the project;

2. **Deny** the appeal of the Advisory Agency's approval of Vesting Tentative Tract Map No. 73891;

3. **Sustain** the decision of the Advisory Agency to approve Vesting Tentative Tract Map No. 73891;

4. **Adopt** the attached findings of the Advisory Agency;

5. **Advise** the applicant that, pursuant to California State Public Resources Code Section 21081.6, the City shall monitor or require evidence that mitigation conditions are implemented and maintained throughout the life of the project and the City may require any necessary fees to cover the cost of such monitoring, and

6. **Advise** the applicant that pursuant to State Fish and Game Code Section 711.4, a Fish and Game Fee is now required to be submitted to the County Clerk prior to or concurrent with the Environmental Notice of Determination (NOD) filing.

VINCENT P. BERTONI, AICP
Advisory Agency

Henry Chu
Deputy Advisory Agency

Heather Bleemers
City Planner

Oliver Netburn
City Planning Associate

ADVICE TO PUBLIC: *The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the *Commission Secretariat, Room 525, City Hall, 200 North Spring Street, Los Angeles, CA 90012* (Phone No. 213-978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent to the week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to these programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request not later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1300.

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PROJECT ANALYSIS

Project Summary

Vesting Tentative Tract Map No. 73891 was approved by the Advisory Agency on June 27, 2017 for a one-lot subdivision, including the merger and vacation of a public alley right-of-way to create 129 residential condominiums (Exhibit A). The Vesting Tentative Tract Map approval was subsequently appealed by an aggrieved party (Exhibit B).

Background

The proposed project involves the demolition of the existing commercial structures and surface parking lots, and the construction, use and maintenance of a new, five-story 129-unit multi-family residential building, including 15 dwelling units set aside for Very Low Income Households, over a two-level subterranean garage providing 154 automobile parking spaces and 146 bicycle parking spaces. The project includes seven (7) live-work units, 63 studios, 60 one-bedroom units, and six (6) two-bedroom units.

The project will provide 17,766 square feet of open space, including, but not limited to, 12,691 square feet of common open space throughout the first and fifth levels, 1,325 square feet of amenity space on the first and fifth levels, including a gymnasium and clubroom, and 3,800 square feet of private deck and balcony space throughout all levels of the project. Included in the common open space is two (2) outdoor BBQ and bar areas, three (3) fire pits, an outdoor dining area, cabanas, an outdoor TV, a community garden, and a sink and counter area. The project is also required to plant a minimum of 33 trees, but is proposing 69 trees.

The project is required to provide 68 vehicle parking spaces however will provide a total of 154 vehicle parking spaces - 89 spaces at the first subterranean level and 65 spaces second subterranean level - and a total of 146 bicycle parking spaces. All vehicular and bicycle access to the project site will be from one (1) driveway off of Butler Avenue. The existing curb cuts and driveways along Gateway Boulevard (designated a Boulevard II) will be removed in order to reduce any impact on circulation to the surrounding area.

In addition to the instant Vesting Tentative Tract Map application, the applicant had concurrently requested under Case No. DIR-2015-4086-DB-CDO-SPR, the following:

1. a 35% Density Bonus (with 15% of the base number of units set aside for Very Low Income households); Pursuant to AB 744 parking to be provided at a rate of 0.5 parking space for each bedroom; and three (3) On-Menu Incentives as follows:

    a. a 35 percent increase in the maximum allowable FAR from 1.5:1 (for the [Q]C2-1VL-CDO portion of the site) and 3:1 (for the R3-1 portion of the site) to 2.24:1 FAR across the site;

    b. an increase in building height of 11 feet for a maximum height of 56 feet, and

    c. the averaging of FAR, density, parking, and open space and permit vehicular access from a less restrictive zone to a more restrictive zone;

2. a Director's Determination for the West Pico Boulevard Community Design Overlay Plan, and

3. a Site Plan Review for a development project which creates or results in an increase of 50 or more guest rooms.

The Director of City Planning approved Case No. DIR-2015-4086-DB-CDO-SPR on June 20, 2017. No appeal was filed and therefore the approval of Case No. DIR-2015-4086-DB-CDO-SPR is considered final and is not before the City Planning Commission for consideration.

The subject property is a flat, irregular-shaped, 43,204 square-foot (0.99 acres) lot (after dedications and vacation of the abutting alley) with a 270-foot frontage along Gateway Boulevard, a 20-foot frontage along Exposition and Pico Boulevards, a 275-foot frontage along Butler Avenue and an 80-foot frontage along Colby Avenue. The property includes two (2) California Sycamores (Platanus racemosa) which may be removed as part of the project. The Palms - Mar Vista - Del Rey Community Plan currently designates the subject property for General Commercial land uses with corresponding zones of C1.5, C2, C4, RAS3 and RAS4.

The surrounding properties consist of Low Residential, Medium Residential, General Commercial, Neighborhood Commercial, Limited Industrial, Light Manufacturing and Public Facilities land uses and are zoned R1-1, R3-1VL, R3-1, [T][Q]C2-1VL-CDO, [Q]C2-1VL-CDO, [Q]CM-1VL-CDO, [Q]M2-1VL-CDO and PF-1XL. Surrounding properties are primarily developed with one-story single-family residential, two- to four-story multi-family residential and one- to two-story commercial buildings. North of the subject property is the Metro Expo Line and south of the subject property, across Colby Avenue, is St. Joan of Arc Church.

The Department of City Planning issued Mitigated Negative Declaration ENV-2015-4087-MND on March 30, 2017 (Exhibit C). The Department found that potential negative impacts could occur from the project's implementation due to Biological Resources (tree removal) and Traffic/Transportation (pedestrian safety). Upon approval of the DIR-2015-4086-DB-CDO-SPR, the Director of City Planning certified that Mitigated Negative Declaration No. ENV-2015-4087-MND reflects the independent judgment of the lead agency and determined that this project would not have a significant effect upon the environment provided the potential impacts identified above are mitigated to a less than significant level through implementation of the adopted mitigation measures, which are reflected in Condition No. 29 of the Tract's approval.

Public Hearing and Public Correspondence

An initial Public Hearing was held jointly with the Deputy Advisory Agency for Case No. VTT-73891 and the Hearing Officer for Case No. DIR-2015-4086-DB-CDO-SPR on April 26, 2017, at 9:30 a.m., at City Hall in Downtown Los Angeles. The hearing was attended by approximately eight (8) people, including the applicant, the applicant's representatives, members of the community and a representative from Council District 11. Two (2) members member of the public spoke in support of the proposed project and four (4) members of the public spoke in opposition. Staff received approximately 40 email correspondence, with 36 emails in favor of the project, one (1) in opposition of the project and three (3) neutral.

The Deputy Advisory Agency (DAA) did not render an instant decision and, instead, the case was held under advisement pending the submission of additional plans.

On June 27, 2017, the Advisory Agency approved Vesting Tentative Tract Map No. 73891 for a one-lot subdivision, including the merger and vacation of a public alley right-of-way to create 129 residential condominiums. On July 7, 2017, Joseph Nguyen of St. Joan of Arc Church and neighbors from Colby and Butler Avenues, appealed the decision.

APPEAL ANALYSIS

The proposed project approval received one (1) appeal from Joseph Nguyen of St. Joan of Arc Church and neighbors from Colby and Butler Avenues. The appeal points raised relate to the vacation and merger of the public alley, the removal of two (2) California Sycamores (Platanus racemosa), the designation of the Front and Side Lot Lines, and the project's height, number of units, density and the project's density bonus grant.

The following statements have been compiled from the submitted appeal. The appeal in its entirety have been attached herein for reference (Exhibit B).

1. **VACATION AND MERGER OF THE PUBLIC ALLEY**

Appellants:

The City should not give away public property to the development through the vacation and merger of the public alley.

Staff Response:

The Advisory Agency, including the Department of City Planning and the Bureau of Engineering, discussed the applicant's request to vacate and merge the portion of the public alley which directly abuts the subject property. In reviewing the current condition and use of the public alley, as well as the surrounding street network, it was determined that the public alley abutting the subject property did not serve a public use and that the requested vacation and merger of the public alley would be reasonable. Nevertheless, the project has been conditioned to obtain additional review under Condition No. 1 which requires that "the Department of Transportation (DOT) issue a letter to the City Engineer stating that the proposed alley merger area is not necessary for present and future public use."

As it relates to the current use of the public alley, the public alley is currently gated and locked where the alley abuts the subject property and at its southern terminus with Pearl Street, 770 feet to the south. Furthermore, while it is understood that some members of the neighborhood have keys to the locks and therefore have access to the alley, the alley is unimproved and not used for public circulation purposes. The alley is primarily dirt and grass and in some locations used as an extension to various private rear yards.

As it relates to the future use of the public alley, the proposed project has been conditioned to construct a Fire Department Turnaround entirely on the subject property which would allow the City to fully improve the public alley while maintaining fire safety standards.

Lastly, the public alley runs parallel to and then terminates at Butler Avenue at the subject property. Any potentially displaced traffic could be easily accommodated by Butler Avenue and would provide the same circulation pattern.

Therefore, the public alley does not serve a public purpose and the Advisory Agency's approval of the vacation and merger is appropriate.

2. **THE REMOVAL OF TWO (2) CALIFORNIA SYCAMORES (PLATANUS RACEMOSA)**

Appellants:

The appellants specifically appealed Condition No. 22 which allows for the removal of two (2) California Sycamores (Platanus racemosa), however the appellants do not specify the reasons for the objection.

Staff Response:

In the applicant's filing, there was a request to remove two (2) California Sycamores (Platanus racemosa). In order to permit the removal of protected trees, pursuant to Section 17.05-R of the L.A.M.C. (Design Standard - Protected Tree Regulations), the Advisory Agency must find one (1) of the following:

1. There has been prior applicable government action, or

2. The removal of the protected tree would not result in an undesirable, irreversible soil erosion through diversion or increased flow of surface waters that cannot be mitigated to the satisfaction of the City's Chief Forester, and the physical condition or location of the tree is such that:

    a. Its continued presence in its existing location prevents the reasonable development of the property; or

    b. According to a report required pursuant to Section 17.06 C., acceptable to the Advisory Agency and prepared by a tree expert, there is a substantial decline from a condition of normal health and vigor of the tree, and its restoration through appropriate and economically reasonable preservation procedures and practices is not advisable; or

    c. It is in danger of falling due to an existing and irreversible condition; or

    d. Its continued presence at its existing location interferes with proposed utility services or roadways within or without the subject property, and the only reasonable alternative to the interference is the removal of the tree; or

    e. It has no apparent aesthetic value, which will contribute to the appearance and design of the proposed subdivision; or

    f. It is not located with reference to other trees or monuments in such a way as to acquire a distinctive significance at the location.

Upon review of the proposed project, it was found that the location of the two (2) California Sycamores were within the building footprint and more specifically the underground parking and therefore their continued existence would prevent reasonable development of the property including the loss of desired on-site parking.

Therefore, Condition No. 22 is proper in that the appropriate findings were made by the Advisory Agency in approving the removal of the two (2) California Sycamores.

3. **DESIGNATION OF THE FRONT AND SIDE LOT LINES**

Appellant:

The appellants specifically appealed Condition No. 23 which designated the Lot Lines along Gateway Boulevard and Colby Avenue as Front Lot Lines and all other Lot Lines as Side Lot Lines, however the appellants do not specify the reasons for the objection.

Staff Response:

The subject property is an irregular-shaped lot with frontage on five (5) different streets, including approximately 270 feet along Gateway Boulevard, 20 feet along Exposition/Pico Boulevards, 275 feet along Butler Avenue and 80 feet along Colby Avenue. In such situations with multiple frontages, the front lot line is determined to be that with the narrowest street frontage, which would be the 20-foot frontage along Exposition/Pico Boulevards. However, pursuant to the Los Angeles Municipal Code Section 17.03, the Advisory Agency has the authority to approve the design of any subdivision, including the designation of a subdivision's Lot Lines and Yards.

In this case, the Advisory Agency determined that it would be appropriate to designate the Lot Lines along Gateway Boulevard and Colby Avenue as the Front Lot Lines in order to ensure the design and improvement of the proposed subdivision be consistent with the General Plan. Specifically, as no front yard setback is required in the C2 Zone, however, by designating the Front Lot Line along Gateway Boulevard and Colby Avenue, the project would able to be built to the property line along the site's longest frontage. Alternatively, if the Gateway Boulevard and Colby Avenue Lot Lines were designated as Side Lot Lines, the building would be required an eight-foot (8') setback from those property lines. Given these two alternatives, the Advisory Agency found that allowing the building to be built to the property lines along Gateway Boulevard and Colby Avenue would be consistent with the not only the Citywide Residential Design Guidelines, but also with the standards and regulations of the West Pico Boulevard Community Design Overlay District, including Guideline No. 2.

Therefore, Condition No. 23 is proper in that it ensures that the design and improvement of the proposed subdivision is consistent with the General Plan.

4. **HEIGHT, DENSITY AND DENSITY BONUS**

Appellant:

The appellants state objection to the proposed height, density and density bonus, however the appellants do not specify the reasons for the objection.

Staff Response:

The instant Vesting Tentative Tract Map was filed concurrently with Case No. DIR-2015-4086-DB-CDO-SPR. Case No. DIR-2015-4086-DB-CDO-SPR included the following requests:

1. a 35% Density Bonus (with 15% of the base number of units set aside for Very Low Income households); Pursuant to AB 744 parking to be provided at a rate of 0.5 parking space for each bedroom; and three (3) On-Menu Incentives as follows:

    a. a 35 percent increase in the maximum allowable FAR from 1.5:1 (for the [Q]C2-1VL-CDO portion of the site) and 3:1 (for the R3-1 portion of the site) to 2.24:1 FAR across the site;

b. an increase in building height of 11 feet for a maximum height of 56 feet, and

c. the averaging of FAR, density, parking, and open space and permit vehicular access from a less restrictive zone to a more restrictive zone;

2. a Director's Determination for the West Pico Boulevard Community Design Overlay Plan, and

3. a Site Plan Review for a development project which creates or results in an increase of 50 or more guest rooms.

An initial Public Hearing was held jointly with the Deputy Advisory Agency for Case No. VTT-73891 and the Hearing Officer for Case No. DIR-2015-4086-DB-CDO-SPR on April 26, 2017, at 9:30 a.m., at City Hall in Downtown Los Angeles. On June 02, 2017, the Director of City Planning approved Case No. DIR-2015-4086-DB-CDO-SPR with an appeal period ending on July 6, 2017. No appeal was timely filed against the Director action. The instant appeal was filed July 7, 2017.

The appellant's objections would be appropriate to consider had an appeal of Case No. DIR-2015-4086-DB-CDO-SPR been filed, however, within the context of an appeal of the Vesting Tentative Tract Map, the authority and the decision of the Advisory Agency did not grant height, density and a density bonus. Nevertheless, with regard to Case No. DIR-2015-4086-DB-CDO-SPR, the proposed project set aside 15% of the base density for Very Low Income Households and was therefore entitled to a 35% density bonus and three (3) on-menu incentives, including those enumerated above. These on-menu incentives will provide for affordable housing costs as defined in California Health and Safety Code Section 50053 for rents for the affordable units.

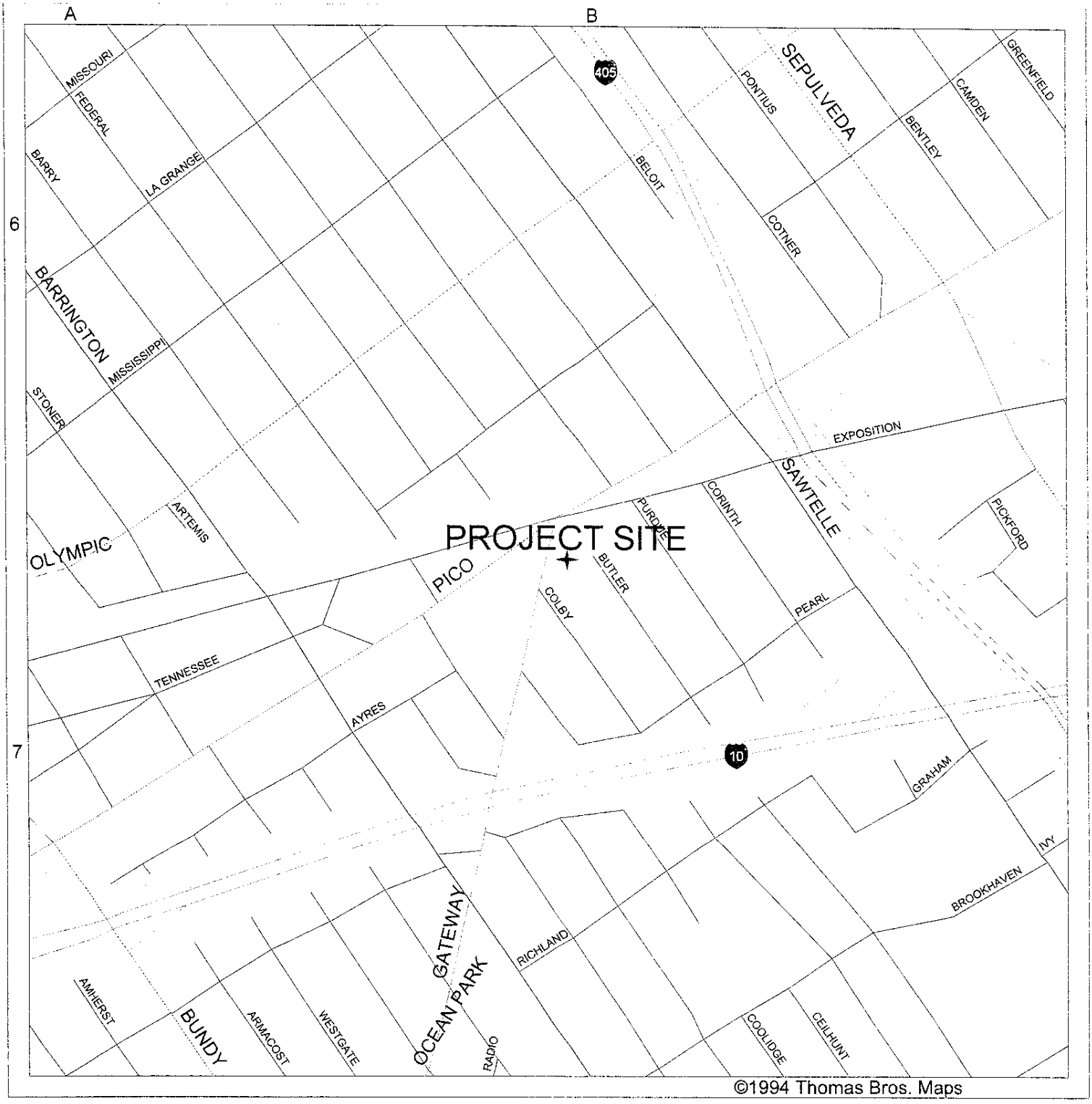
Therefore, while the height, density and density bonus are not before the City Planning Commission, the approval of a 35% density bonus requesting three (3) on-menu incentives is consistent with applicable the Municipal Code and with State Law.

Conclusion

Based on the aforementioned information, the Advisory Agency did not err or abuse their authority. The proposed map is consistent with the State's Subdivision Map Act, the General Plan, and is consistent with the adopted Palms - Mar Vista - Del Rey Community Plan. In addition, the environmental document properly analyzed the project's potential environmental impacts and all significant environmental impacts were mitigated to less than significant levels. Therefore, staff recommends that the appeal be denied and decision of the Advisory Agency be **sustained**.

Map 1

Vicinity Map



VICINITY MAP

SITE : 11460-11488 W. GATEWAY BLVD.

GC MAPPING SERVICE, INC.

3055 WEST VALLEY BOULEVARD
ALHAMBRA CA 91803
(626) 441-1080, FAX (626) 441-8850
GCMAPPING@RADIUSMAPS.COM

Map 2

Radius Map

DENSITY BONUS
SITE PLAN REVIEW
TENTATIVE TRACT MAP NO. 73891
COMMUNITY DESIGN OVERLAY

OWNER
KLST 11460 GATEWAY LLC
2444 WILSHIRE BLVD #200
SANTA MONICA CA 90403
TT 73891

APPLICANT
MOSS & COMPANY
ATTN: RANDY KIRSHNER
15300 VENTURA BLVD SUITE 416
SHERMAN OAKS CA 91403
TT 73891

REPRESENTATIVE
THREE6IXTY
ATTN: JUSTIN FLEMING
4309 OVERLAND AVE
CULVER CITY CA 90230
(310) 204-3500

C.D. 11
C.T. 2712.00
P.A. PALMS-MAR VISTA-DEL REY

LEGAL: LOTS 86-94, TRACT NO. 7888, AND LOT 3, TRACT NO. 22493.

SITE: 11460-88 GATEWAY BLVD.

GC MAPPING SERVICE, INC.
3055 WEST VALLEY BOULEVARD
ALHAMBRA CA 91803
(626) 441-1080 FAX (626) 441-8850

0.90 NET AC.

CASE NO.
DATE: 10-02-2015
SCALE: 1" = 100'
USES FIELD
D.M. 123 B 153

T.B. PAGE: 632 GRID: B-7

Exhibit A

Advisory Agency's Decision Letter and Tract Map

DEPARTMENT OF
CITY PLANNING

CITY PLANNING COMMISSION

DAVID H. J. AMBROZ
PRESIDENT

RENEE DAKE WILSON
VICE-PRESIDENT

CAROLINE CHOE
RICHARD KATZ
JOHN W. MACK
SAMANTHA MILLMAN
MARC MITCHELL
VERONICA PADILLA-CAMPOS
DANA M. PERLMAN

ROCKY WILES
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CITY OF LOS ANGELES
CALIFORNIA

ERIC GARCETTI
MAYOR

EXECUTIVE OFFICES
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http://planning.lacity.org

Decision Date: June 27, 2017

Appeal Period Ends: July 7, 2017

11460 Gateway, LLC (A)(O)
Mr. Randy Kirshner
15300 Ventura Boulevard, Suite 405
Sherman Oaks, CA 91403

three6ixty (R)
Dana Sayles
4309 Overland Avenue
Culver City, CA 90230

Hahn and Associates, Inc. (E)
Brandon M. Hahn
26074 Avenue Hall, Suite 2
Valencia, CA 91355

RE: Vesting Tentative Tract Map No. 73891
Address: 11460–11488 West Gateway Boulevard; 2426 South Colby Avenue; 2425 South Butler Avenue
Related Case: DIR-2015-4086-DB-CDO-SPR
Planning Area: Palms - Mar Vista - Del Rey
Zones : [Q]C2-1VL-CDO & R3-1
D. M. : 174B125
C. D. : 11 - Bonin
CEQA : ENV-2015-4087-MND

In accordance with provisions of Los Angeles Municipal Code (LAMC) Section 17.15, the Advisory Agency approved Vesting Tentative Tract Map No. 73891, located at 11460-11488 West Gateway Boulevard, 2426 South Colby Avenue and 2425 South Butler Avenue, for a maximum of a **one-lot subdivision, including the merger and vacation of a public alley right-of-way to create 129 residential condominiums**, as shown on map stamp-dated September 20, 2016 in the Palms - Mar Vista - Del Rey Community Plan. This unit density is based on the [Q]C2-1VL-CDO and R3-1 Zones. (The subdivider is hereby advised that the LAMC may not permit this maximum approved density. Therefore, verification should be obtained from the Department of Building and Safety, which will legally interpret the Zoning code as it applies to this particular property.) For an appointment with the Development Services Center call (213) 482-7077, (310) 231-2901 or (818) 374-5050. The Advisory Agency's consideration is subject to the following conditions:

NOTE on clearing conditions: When two or more **agencies** must clear a condition, subdivider should follow the sequence indicated in the condition. For the benefit of the applicant, subdivider shall maintain record of all conditions cleared, including all material supporting clearances and be prepared to present copies of the clearances to each reviewing agency as may be required by its staff at the time of its review.

BUREAU OF ENGINEERING - SPECIFIC CONDITIONS

1. That the Department of Transportation issue a letter to the City Engineer stating that the proposed alley merger area is not necessary for present and future public use.

2. That suitable alley turnaround area be dedicated at the new terminus of the alley to provide an alley turning area.

3. That a 20-foot wide and variable width alley southeasterly of Gateway Boulevard adjoining the subdivision be permitted to be merged with the remainder of the tract map pursuant to Section 66499.20.2 of the State Government Code, and in addition, the following be done and be administered by the City Engineer:

   a. That reversionary rights to the alley being merged and waivers of any damages that may accrue as a result of such merger be obtained from all underlying property owners who might have certain rights in the area being merged.

   b. That satisfactory arrangements be made with all public utility agencies maintaining existing facilities within the area being merged.

   c. That a certified survey map be submitted showing the dimensions and areas being merged with this map satisfactory to the City Engineer.

4. That any surcharge fee in conjunction with the street merger request be paid.

5. That the subdivider make a request to the West Los Angeles District Office of the Bureau of Engineering to determine the capacity of the existing sewer in the area.

6. That satisfactory arrangements be made with the Gas Company for the relocation of existing facilities in the proposed alley merger area.

7. That existing right-of-way of Butler Avenue be correctly shown on final map.

8. That any fee deficit under Work Order No. EXT000646 expediting this project be paid.

DEPARTMENT OF BUILDING AND SAFETY, GRADING DIVISION

9. That prior to issuance of a grading or building permit, or prior to recordation of the final map, the subdivider shall make suitable arrangements to assure compliance, satisfactory to the Department of Building and Safety, Grading Division, with any requirements with the Department of Building and Safety, Grading Division for recordation of the final map and issuance of any permit.

DEPARTMENT OF BUILDING AND SAFETY, ZONING DIVISION

10. Prior to recordation of the final map, the Department of Building and Safety, Zoning Division shall certify that no Building or Zoning Code violations exist on the subject site. In addition, the following items shall be satisfied:

    a. Obtain permits for the demolition or removal of all existing structures on the site. Accessory structures and uses are not permitted to remain on lots without a main structure or use. Provide copies of the demolition permits and signed inspection cards to show completion of the demolition work.
    b. Provide a copy of DIR case DIR-2015-4086-DB-CDO-SPR. Show compliance with all the conditions/requirements of the DIR case as applicable.

c. Show all street/alley dedication(s) as required by Bureau of Engineering and provide net lot area after all dedication. "Area" requirements shall be re-checked as per net lot area after street/alley dedication(s). Front and side yard requirements shall be required to comply with current code as measured from new property lines after dedication.

d. Obtain Bureau of Engineering approval for the proposed alley merger.

e. The submitted Map does not comply with the allowable maximum density (34,431/400=86 units in C2 Zone and 10,145/800=12 units in R3 Zone, maximum of 98 units allow) requirement of the [Q]C2-1VL-CDO/R3-1 Zone. Revise the Map to show compliance with the above requirement or obtain approval from the Department of City Planning. Approval of DIR-2015-4086-DB-CDO-SPR shall satisfy this condition.

Notes:

This property is located in the West Pico Boulevard Community Design Overlay.

The submitted Map may not comply with the number of parking spaces required by Section 12.21-A,4(a) based on number of habitable rooms in each unit. If there are insufficient numbers of parking spaces, obtain approval from the Department of City Planning.

The submitted Map may not comply with the number of guest parking spaces required by the Advisory Agency.

Should the Map be implemented in conjunction with an approved Density Bonus project, the parking requirements, including the total number of parking spaces required and the number of guest parking spaces required, shall be governed by the provisions of L.A.M.C. Section 12.22-A,25 or California Government Code Sections 65915-65918.

Any proposed structures or uses on the site have not been checked for and shall comply with Building and Zoning Code requirements. Plan check will be required before any construction, occupancy or change of use.

DEPARTMENT OF TRANSPORTATION

11. A minimum of 20-foot reservoir space be provided between any security gate(s) and the property line or to the satisfaction of the Department of Transportation.

12. Parking stalls shall be designed so that a vehicle is not required to back into or out of any public street or sidewalk.

13. This project is subject to the West Los Angeles Transportation Improvement and Mitigation Specific Plan requirements. A parking area and driveway plan shall be submitted to the Department of Transportation for approval prior to submittal of building permit plans for plan check by the Department of Building and Safety. Final DOT approval should be accomplished by submitting detailed site/driveway plans at a scale of 1"=40' to DOT's West LA/Coastal Development Review Section located at 7166 W. Manchester Ave., Los

Angeles, 90045. Please contact 213-485-1062 for an appointment.

FIRE DEPARTMENT

14. Prior to the recordation of the final map, a suitable arrangement shall be made satisfactory to the Fire Department, binding the subdivider and all successors to the following:

a. Access for Fire Department apparatus and personnel to and into all structures shall be required.

b. Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units.

c. The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

d. **Policy Exception**:

L.A.M.C. 57.09.03.B Exception:

- When this exception is applied to a fully fire sprinklered residential building equipped with a wet standpipe outlet inside an exit stairway with at least a 2 hour rating the distance from the wet standpipe outlet in the stairway to the entry door of any dwelling unit or guest room shall not exceed 150 feet of horizontal travel and the distance from the edge of the roadway of an improved street or approved fire lane to the door into the same exit stairway directly from outside the building shall not exceed 150 feet of horizontal travel.

- It is the intent of this policy that in no case will the maximum travel distance exceed 150 feet inside the structure and 150 feet outside the structure. The term “horizontal travel” refers to the actual path of travel to be taken by a person responding to an emergency in the building.

- This policy does not apply to single-family dwellings or to non-residential buildings.

e. Building designs for multi-storied residential buildings shall incorporate at least one access stairwell off the main lobby of the building; But, in no case greater than 150 feet horizontal travel distance from the edge of the public street, private street or Fire Lane. This stairwell shall extend unto the roof.

f. Entrance to the main lobby shall be located off the address side of the building.

g. Any required Fire Annunciator panel or Fire Control Room shall be located within 50 feet visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department.

h. Where rescue window access is required, provide conditions and improvements necessary to meet accessibility standards as determined by the Los Angeles Fire Department.

i. No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

j. Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.

k. The width of private roadways for general access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky.

l. Submit plot plans indicating access road and turning area for Fire Department approval.

m. All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued.

n. Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.

o. No framing shall be allowed until the roadway is installed to the satisfaction of the Fire Department.

p. Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction.

q. Site plans shall include all overhead utility lines adjacent to the site.

r. Any roof elevation changes in excess of 3 feet may require the installation of ships ladders.

s. Fire lanes, where required and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

t. Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot.

u. Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.

v. Plans showing areas to be posted and/or painted, “FIRE LANE NO PARKING” shall be submitted and approved by the Fire Department prior to building permit application sign-off.

w. Electric gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety granting a Certificate of Occupancy.

x. No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along path of travel.

y. Any roof elevation changes in excess of 3 feet may require the installation of ships ladders.

DEPARTMENT OF WATER AND POWER

15. Satisfactory arrangements shall be made with the Los Angeles Department of Water and Power (LADWP) for compliance with LADWP's Water System Rules and requirements. Upon compliance with these conditions and requirements, LADWP's Water Services Organization will forward the necessary clearances to the Bureau of Engineering. (This condition shall be deemed cleared at the time the City Engineer clears Condition No. S-1.(c).)

BUREAU OF SANITATION

16. Satisfactory arrangements shall be made with the Bureau of Sanitation, Wastewater Collection Systems Division for compliance with its sewer system review and requirements. Upon compliance with its conditions and requirements, the Bureau of Sanitation, Wastewater Collection Systems Division will forward the necessary clearances to the Bureau of Engineering. (This condition shall be deemed cleared at the time the City Engineer clears Condition No. S-1.(d).)

INFORMATION TECHNOLOGY AGENCY

17. To assure that cable television facilities will be installed in the same manner as other required improvements, please email cabletv.ita@lacity.org that provides an automated response with the instructions on how to obtain the Cable TV clearance. The automated response also provides the email address of 3 people in case the applicant/owner has any additional questions.

DEPARTMENT OF RECREATION AND PARKS

18. That the Quimby fee be based separately on the number of dwelling units within the R3 and [Q]C2-1VL-CDO zone portions of the site.

URBAN FORESTRY DIVISION AND THE DEPARTMENT OF CITY PLANNING

19. The applicant shall submit a tree report and a landscape plan prepared by a protected Tree Expert as designated by LAMC Ordinance No. 177,404, for approval by the City Planning Department and the Urban Forestry Division of the Bureau of Street Services. The Tree Report shall provide species, health, and condition of all trees with tree locations on a site survey. The plan shall contain the Tree Expert's recommendations for the preservation of as many desirable (eight inches diameter or greater) trees as possible. An on-site 1:1 tree replacement shall be required for the unavoidable loss of any desirable on-site trees.

20. Plant street trees and remove any existing trees within dedicated streets or proposed dedicated streets as required by the Urban Forestry Division of the Bureau of Street Services. All street tree plantings shall be brought up to current standards. When the City has previously been paid for tree plantings, the sub divider or contractor shall notify the Urban Forestry Division (213-847-3077) upon completion of construction to expedite tree planting.

DEPARTMENT OF CITY PLANNING-SITE SPECIFIC CONDITIONS

21. Prior to the recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:

    a. Limit the proposed development to a one-lot subdivision with a maximum of 129 residential condominiums

    b. All parking shall be provided in compliance with the Los Angeles Municipal Code and as otherwise approved under DIR-2015-4086-DB-CDO-SPR.

    c. Prior to issuance of a certificate of occupancy, a minimum six-foot-high slumpstone or decorative masonry wall shall be constructed adjacent to neighboring residences, if no such wall already exists, except in required front yard. No such wall shall be required adjacent to the multi-family residential building to the south (along Colby Avenue) if the construction of said wall would conflict with fire access.

    d. That a solar access report shall be submitted to the satisfaction of the Advisory Agency prior to obtaining a grading permit.

    e. That the subdivider considers the use of natural gas and/or solar energy and consults with the Department of Water and Power and Southern California Gas Company regarding feasible energy conservation measures.

    f. Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material.

    g. Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties or the public right-of-way.

22. The removal of two (2) California Sycamores (Platanus racemosa) shall be permitted. A minimum of two (2) trees (each with a minimum of 15 gallons measuring 1-inch in diameter and at least 7 feet in height measured from the base) shall be planted for each California Sycamores that is removed.

23. For the purposes of this subdivision, the Lot Lines along Gateway Boulevard and Colby Avenue shall be designated as Front Lot Lines and all other Lot Lines shall be designated as Side Lot Lines.

24. **Regulatory Compliance Measures:**

    a. **Archaeological.** If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. 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. 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.
        i. Distinctive features, finishes and construction techniques or examples of skilled craftsmanship which characterize an historic property shall be preserved.

ii. Deteriorated historic features shall be repaired rather than replaced. Where the severity if deterioration requires replacement of a distinctive historic feature, the new feature shall match the old in design, color, texture, and other visual qualities, and where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

iii. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

iv. Significant archaeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

v. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

vi. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

b. **Human Remains.** If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

- Stop immediately and contact the County Coroner:

  1104 N. Mission Road
  Los Angeles, CA 90033
  323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
  323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).

The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.

- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.

- If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

25. Prior to the issuance of the building permit or the recordation of the final map, a copy of the DIR-2015-4086-DB-CDO-SPR shall be submitted to the satisfaction of the Advisory Agency. In the event that DIR-2015-4086-DB-CDO-SPR is not approved, the subdivider shall submit a tract modification.

26. Prior to the clearance of any tract map conditions, the applicant shall show proof that all fees have been paid to the Department of City Planning, Expedited Processing Section.

27. **Indemnification and Reimbursement of Litigation Costs.**

Applicant shall do all of the following:

(i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

(ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.

(iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than $50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in

the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.
For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

DEPARTMENT OF CITY PLANNING-ENVIRONMENTAL MITIGATION MEASURES

28. Prior to recordation of the final map the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department requiring the subdivider to identify mitigation monitors who shall provide periodic status reports on the implementation of mitigation items required by Mitigation Condition Nos. 29 of the Tract's approval satisfactory to the Advisory Agency. The mitigation monitors shall be identified as to their areas of responsibility, and phase of intervention (pre-construction, construction, postconstruction/maintenance) to ensure continued implementation of the above mentioned mitigation items.

29. Prior to the recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:

MM-1. **Biological Resources (Significant and Protected Tree Removal).** Removal or planting of trees in the public right-of-way and/or removal of all protected trees shall require approval by the Board of Public Works and the Advisory Agency in the course of reviewing and approving the Vesting Tentative Tract Map, and shall adhere to the following measures:

- Prior to the issuance of any permit, the required Tree Report and plot plan shall indicate the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way and shall be submitted for review and approval to the Urban Forestry Division of the Bureau of Street Services, Department of Public Works.

Regarding the Significant Street Trees:

- All significant trees (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) on the site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree.

- A Landscape Plan shall be prepared, indicating the location of all replacement trees, to the satisfaction of the decision-maker. Net, new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.

- All trees in the public right-of-way shall be provided per the current standards of the Urban Forestry Division of the Department of Public Works, Bureau of Street Services.

Regarding the Protected On-Site Trees:

- A minimum of two (2) trees (each with a minimum of 15 gallons measuring 1-inch in diameter and at least 7 feet in height measured from the base) of a protected species variety shall be planted for each protected tree that is removed. The canopy of the replacement trees, at the time they are planted, shall be in proportion to the canopies of the protected trees removed and shall be to the satisfaction of the Advisory Agency and the Urban Forestry Division.

- The location of the trees planted for the purposes of replacing a removed protected tree shall be clearly indicated on the required Landscape Plan, which shall also indicate the replacement tree species and further contain the phrase “Replacement Tree” in its description.

- The applicant shall post a cash bond or other assurances acceptable to the Bureau of Engineering in consultation with the Urban Forestry Division and the decision-maker guaranteeing the survival of trees required to be maintained, replaced, or relocated in such a fashion as to assure the existence of continuously living trees for a minimum of three (3) years from the date that the bond is posted or from the date such trees are replaced or relocated, whichever is longer. Any change of ownership shall require that the new owner post a new protected tree bond to the satisfaction of the Bureau of Engineering. Subsequently, the original owner’s protected tree bond may be exonerated. The City Engineer shall use the provisions of Section 17.08 as its procedural guide in satisfaction of said bond requirements and processing. Prior to exoneration of the bond, the owner of the property shall provide evidence satisfactory to the City Engineer and Urban Forestry Division that the protected trees were properly replaced, the date of the replacement, and the survival of the replacement trees for a period of three (3) years.

MM-2. **Transportation/Traffic (Hazards).** The applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times. Specifically, this measure shall include the following:

- Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.

- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.

- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

DEPARTMENT OF CITY PLANNING-STANDARD CONDOMINIUM CONDITIONS

C-1. That approval of this tract constitutes approval of model home uses, including a sales office and off-street parking. Where the existing zoning is (T) or (Q) for multiple residential use, no construction or use shall be permitted until the final map has recorded or the proper zone has been effectuated. If models are constructed under this tract approval, the following conditions shall apply:

1. Prior to recordation of the final map, the subdivider shall submit a plot plan for approval by the Division of Land Section of the Department of City Planning showing the location of the model dwellings, sales office and off-street parking. The sales office must be within one of the model buildings.

2. All other conditions applying to Model Dwellings under Section 12.22-A,10 and 11 and Section 17.05-O of the LAMC shall be fully complied with satisfactory to the Department of Building and Safety.

C-2. Prior to the recordation of the final map, the subdivider shall pay or guarantee the payment of a park and recreation fee based on the latest fee rate schedule applicable. The amount of said fee to be established by the Advisory Agency in accordance with LAMC Section 17.12 and is to be paid and deposited in the trust accounts of the Park and Recreation Fund.

C-3. Prior to obtaining any grading or building permits before the recordation of the final map, a landscape plan, prepared by a licensed landscape architect, shall be submitted to and approved by the Advisory Agency in accordance with CP-6730.

In the event the subdivider decides not to request a permit before the recordation of the final map, a covenant and agreement satisfactory to the Advisory Agency guaranteeing the submission of such plan before obtaining any permit shall be recorded.

C-4. In order to expedite the development, the applicant may apply for a building permit for an apartment building. However, prior to issuance of a building permit for apartments, the registered civil engineer, architect or licensed land surveyor shall certify in a letter to the Advisory Agency that all applicable tract conditions affecting the physical design of the building and/or site, have been included into the building plans. Such letter is sufficient to clear this condition. In addition, all of the applicable tract conditions shall be stated in full on the building plans and a copy of the plans shall be reviewed and approved by the Advisory Agency prior to submittal to the Department of Building and Safety for a building permit.

OR

If a building permit for apartments will not be requested, the project civil engineer, architect or licensed land surveyor must certify in a letter to the Advisory Agency that the applicant will not request a permit for apartments and intends to acquire a building permit for a condominium building(s). Such letter is sufficient to clear this condition.

BUREAU OF ENGINEERING - STANDARD CONDITIONS

S-1. a. That the sewerage facilities charge be deposited prior to recordation of the final map over all of the tract in conformance with Section 64.11.2 of the LAMC.

b. That survey boundary monuments be established in the field in a manner satisfactory to the City Engineer and located within the California Coordinate System prior to recordation of the final map. Any alternative measure approved by the City Engineer would require prior submission of complete field notes in support of the boundary survey.

c. That satisfactory arrangements be made with both the Water System and the Power System of the Department of Water and Power with respect to water mains, fire hydrants, service connections and public utility easements.

d. That any necessary sewer, street, drainage and street lighting easements be dedicated. In the event it is necessary to obtain off-site easements by separate instruments, records of the Bureau of Right-of-Way and Land shall verify that such easements have been obtained. The above requirements do not apply to easements of off-site sewers to be provided by the City.

e. That drainage matters be taken care of satisfactory to the City Engineer.

f. That satisfactory street, sewer and drainage plans and profiles as required, together with a lot grading plan of the tract and any necessary topography of adjoining areas be submitted to the City Engineer.

g. That any required slope easements be dedicated by the final map.

h. That each lot in the tract complies with the width and area requirements of the Zoning Ordinance.

i. That 1-foot future streets and/or alleys be shown along the outside of incomplete public dedications and across the termini of all dedications abutting unsubdivided property. The 1-foot dedications on the map shall include a restriction against their use of access purposes until such time as they are accepted for public use.

j. That any 1-foot future street and/or alley adjoining the tract be dedicated for public use by the tract, or that a suitable resolution of acceptance be transmitted to the City Council with the final map.

k. That no public street grade exceeds 15%.

l. That any necessary additional street dedications be provided to comply with the Americans with Disabilities Act (ADA) of 1990.

S-2. That the following provisions be accomplished in conformity with the improvements constructed herein:

a. Survey monuments shall be placed and permanently referenced to the satisfaction of the City Engineer. A set of approved field notes shall be furnished, or such work shall be suitably guaranteed, except where the setting of boundary monuments requires that other procedures be followed.

b. Make satisfactory arrangements with the Department of Transportation with respect to street name, warning, regulatory and guide signs.

c. All grading done on private property outside the tract boundaries in connection with public improvements shall be performed within dedicated slope easements or by grants of satisfactory rights of entry by the affected property owners.

d. All improvements within public streets, private street, alleys and easements shall be constructed under permit in conformity with plans and specifications approved by the Bureau of Engineering.

e. Any required bonded sewer fees shall be paid prior to recordation of the final map.

S-3. That the following improvements be either constructed prior to recordation of the final map or that the construction be suitably guaranteed:

a. Construct on-site sewers to serve the tract as determined by the City Engineer.

b. Construct any necessary drainage facilities.

c. No street lighting improvement if no street widening per BOE improvement conditions. Otherwise relocate and upgrade street lights; one (1) Colby Avenue and one (1) on Gateway Boulevard.

d. Repair or replace any off-grade or broken curb, gutter and sidewalk satisfactory to the City Engineer.

e. Plant street trees and remove any existing trees within dedicated streets or proposed dedicated streets as required by the Urban Forestry Division of the Bureau of Street Services. All street tree plantings shall be brought up to current standards. When the City has previously been paid for tree plantings, the sub divider or contractor shall notify the Urban Forestry Division (213-847-3077) upon completion of construction to expedite tree planting.

f. Construct access ramps for the handicapped as required by the City Engineer.

g. Close any unused driveways satisfactory to the City Engineer.

h. Construct any necessary additional street improvements to comply with the Americans with Disabilities Act (ADA) of 1990.

i. That the following improvements be either constructed prior to recordation of the final map or that the construction be suitably guaranteed:

a) After submittal of hydrology and hydraulic calculations and drainage plans for review by the City Engineer prior to recordation of the final map, construction of drainage facilities within suitable easement may be required in a manner that runoff will not flow into the merged alley area.

b) Improve the newly dedicated alley turning area satisfactory to the City Engineer.

c) Improve Colby Avenue adjoining the subdivision by the construction of the following:

   i. Repair and replace concrete curb, and concrete gutter.

   ii. Construct new 6-foot concrete sidewalk abutting the property frontage.

   iii. Any necessary removal and reconstruction of existing improvements.

d) Improve Butler Avenue adjoining the subdivision by the construction of the following:

   i. Reconstruct alley intersection with the proposed alley merger to provide a V-cross section.

   ii. Repair and or replace all broken, off-grade asphalt pavement and longitudinal concrete gutter along the alley frontage.

   iii. Any necessary removal and reconstruction of existing improvements.

   iv. The necessary transitions to join the existing improvement.

e) Remove any encroachment into the alley area.

NOTES:

The Advisory Agency approval is the maximum number of units permitted under the tract action. However the existing or proposed zoning may not permit this density.

Approval from Board of Public Works may be necessary before removal of any street trees in conjunction with the improvements in this tract map through Bureau of Street Services Urban Forestry Division.

Satisfactory arrangements shall be made with the Los Angeles Department of Water and Power, Power System, to pay for removal, relocation, replacement or adjustment of power facilities due to this development. The subdivider must make arrangements for the underground installation of all new utility lines in conformance with LAMC Section 17.05-N.

The final map must record within 36 months of this approval, unless a time extension is granted before the end of such period.

The Advisory Agency hereby finds that this tract conforms to the California Water Code, as required by the Subdivision Map Act.

The subdivider should consult the Department of Water and Power to obtain energy saving design features which can be incorporated into the final building plans for the subject development. As

part of the Total Energy Management Program of the Department of Water and Power, this no-cost consultation service will be provided to the subdivider upon his request.

FINDINGS OF FACT (CEQA)

The Department of City Planning issued Mitigated Negative Declaration No. ENV-2015-4087-MND on March 30, 2017. The Department found that potential negative impact could occur from the project's implementation due to the removal of protected trees and pedestrian safety.

The Deputy Advisory Agency certifies that Mitigated Negative Declaration No. ENV-2015-4087-MND reflects the independent judgment of the lead agency and determined that this project would not have a significant effect upon the environment provided the potential impacts identified above are mitigated to a less than significant level through implementation of Condition No. 29 of the Tract's approval. Other identified potential impacts not mitigated by these conditions are mandatorily subject to existing City ordinances, (Sewer Ordinance, Grading Ordinance, Flood Plain Management Specific Plan, Xeriscape Ordinance, Stormwater Ordinance, etc.) which are specifically intended to mitigate such potential impacts on all projects.

The project site, as well as the surrounding area are presently developed with structures and do not provide a natural habitat for either fish or wildlife.

In accordance with Section 21081.6 of the Public Resources Code (AB 3180), the Deputy Advisory Agency has assured that the above identified mitigation measures will be implemented by adopting the attached Mitigation Monitoring Program of ENV-2015-4087-MND.

FINDINGS OF FACT (SUBDIVISION MAP ACT)

In connection with the approval of Vesting Tentative Tract Map No. 73891, the Advisory Agency of the City of Los Angeles, pursuant to Sections 66473.1, 66474.60, .61 and .63 of the State of California Government Code (the Subdivision Map Act), makes the prescribed findings as follows:

(a) THE PROPOSED MAP WILL BE/IS CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

The Vesting Tentative Tract Map was prepared in conformance with the requirements of Section 17.06-B of the Los Angeles Municipal Code ("LAMC"), including being by a Registered Professional Engineer and containing the required components, dimensions, areas, notes, legal description, ownership, applicant, and site address information as required by the LAMC.

The subject property is located within the adopted the Palms - Mar Vista - Del Rey Community Plan which designates the subject property for General Commercial land uses with corresponding zones of C1.5, C2, C4, RAS3 and RAS4.

The property contains 43,204 square-foot (0.99 acres) lot (after dedications and vacation) and is zoned [Q]C2-1VL-CDO and R3-1 which would allow for a by-right density of 97 dwelling units (84 units within the [Q]C2 zoned portion of the property and 13 units within the R3 zoned portion of the property). The applicant is proposing to develop a building containing 129 residential condominium units.

The applicant has requested a 35% Density Bonus under concurrent Case No. DIR-2015-4086-DB-CDO-SPR to permit 129 residential condominium units. The proposed development is contingent upon approval of Case No. DIR-2015-4086-DB-CDO-SPR.

The Subdivision Map Act requires the Advisory Agency find that the proposed map be consistent with the General Plan, which includes Urban Form and Neighborhood Design (Chapter 5 of the General Plan Framework Element). Upon approval of Case No. DIR-2015-4086-DB-CDO-SPR, the project's density, height, setbacks, and massing will be consistent with the zoning regulations, and Chapter 5 of the General Plan Framework Element.

The subdivision will result in a one-lot subdivision, including the merger and vacation of a public alley right-of-way to create 129 residential condominiums, as planned for under the General Commercial General Plan Land Use Designation.

The site is not subject to the Specific Plan for the Management of Flood Hazards (floodways, floodplains, mud prone areas, coastal high-hazard and flood-related erosion hazard areas).

As such, the Advisory Agency concludes that the proposed tract map is consistent with the intent and purpose of the General Plan.

(b) THE DESIGN AND IMPROVEMENT OF THE PROPOSED SUBDIVISION ARE CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

Pursuant to Section 66418 of the Subdivision Map Act, “design” of a map refers to street alignments, grades and widths; drainage and sanitary facilities and utilities, including alignments and grades thereof; location and size of all required easements and rights-of-way; fire roads and firebreaks; lot size and configuration; traffic access; grading; land to be dedicated for park or recreational purposes; and other such specific physical requirements in the plan and configuration of the entire subdivision as may be necessary to ensure consistency with, or implementation of, the general plan or any applicable specific plan. In addition, Section 66427 of the Subdivision Map Act expressly states that the “design and location of buildings are not part of the map review process for condominium, community apartment or stock cooperative projects.”

Section 17.05-C of the LAMC enumerates design standards for Subdivisions and requires that each subdivision map be designed in conformance with the Street Design Standards and in conformance to the General Plan. Section 17.05-C, third paragraph, further establishes that density calculations include the areas for residential use and areas designated for public uses, except for land set aside for street purposes (“net area”). The requested map meets the required components of a tentative map.

The design and layout of the tentative map are consistent with the design standards established by the Subdivision Map Act and Division of Land Regulations of the Los Angeles Municipal Code. Several public agencies (including Department of Building and Safety, Bureau of Engineering, and Bureau of Sanitation) have reviewed the originally-submitted map. The Bureau of Engineering provided comments that have been included as conditions of approval. In addition, the project will be required to comply with providing necessary public access to the on-site easements.

At the April 26, 2017 Deputy Advisory hearing, the Bureau of Engineering modified its originally recommended conditions due to changes in the proposed Tract Map as well as the implementation of Mobility Plan 2035. Specifically, the Bureau of Engineering eliminated the requirement that any dedication be required along Gateway Boulevard, consistent with Mobility Plan 2035, and modified approval of the alley merger contingent upon a letter from the Department of Transportation to the City Engineer stating that the proposed alley merger area is not necessary for present and future public use.

The adopted Palms - Mar Vista - Del Rey Community Plan designates the subject property for General Commercial land uses, corresponding to the C1.5, C2, C4, RAS3 and RAS4 zones. The project site is zoned [Q]C2-1VL-CDO and R3-1, consistent with the range of zones permitted on the site, per the community plan. The applicant has requested a 35% Density Bonus under concurrent Case No. DIR-2015-4086-DB-CDO-SPR to permit 129 residential condominium units. The proposed development is contingent upon approval of Case No. DIR-2015-4086-DB-CDO-SPR.

The subject site includes four (4) street frontages, with the longest frontage along Gateway Boulevard (270 feet). In order to ensure the design and improvement of proposed subdivision is consistent with the General Plan, the Advisory Agency has designated the Lot Lines along Gateway Boulevard and Colby Avenue as Front Lot Lines and all other Lot Lines as Side Lot Lines.

The applicant has submitted a Protected Tree Report, dated September 24, 2015, prepared by L. Newman Design Group, Inc., which describes the property as having a total of seven (7) trees on-site and within the Gateway Boulevard right-of-way, including two (2) protected trees, both California Sycamores (Platanus racemosa). The project, as proposed, would require the removal of all seven (7) trees, including two (2) protected trees. As required per the Mitigated Negative Declaration (ENV-2015-4087-MND), all non-protected significant tree removals would be required to be replaced at a 1:1 ratio with a minimum 24-inch box tree and all protected tree removals would require approval from the Board of Public Works and at a minimum of a 2:1 ratio with a minimum of 15-gallon tree.

Nevertheless, pursuant to Section 17.05-R of the L.A.M.C. (Design Standard - Protected Tree Regulations), protected trees are only permitted to be removed if:

1. There has been prior applicable government action, or

2. The removal of the protected tree would not result in an undesirable, irreversible soil erosion through diversion or increased flow of surface waters that cannot be mitigated to the satisfaction of the City's Chief Forester, and the physical condition or location of the tree is such that:

    a. Its continued presence in its existing location prevents the reasonable development of the property; or

    b. According to a report required pursuant to Section 17.06 C., acceptable to the Advisory Agency and prepared by a tree expert, there is a substantial decline from a condition of normal health and vigor of the tree, and its restoration through appropriate and economically reasonable preservation procedures and practices is not advisable; or

    c. It is in danger of falling due to an existing and irreversible condition; or

    d. Its continued presence at its existing location interferes with proposed utility services or roadways within or without the subject property, and the only reasonable alternative to the interference is the removal of the tree; or

    e. It has no apparent aesthetic value, which will contribute to the appearance and design of the proposed subdivision; or it is not located with reference to other trees or monuments in such a way as to acquire a distinctive significance at the location.

As shown on the submitted Site Plan, the two (2) California Sycamores are within the building footprint. Their removal is necessary to allow for reasonable development of the property.

Therefore, as conditioned, the design and improvement of the proposed subdivision are consistent with the intent and purpose of the applicable General and Specific Plans.

(c) THE SITE IS PHYSICALLY SUITABLE FOR THE PROPOSED TYPE OF DEVELOPMENT.

The subject site is a flat parcel containing 43,204 square-foot (0.99 acres) lot (after dedications and vacation) in the Palms - Mar Vista - Del Rey Community Plan Area. A mix of single- and multi-family residential and commercial uses make up the general character of the surrounding neighborhood. The surrounding properties consist of Low Residential, Medium Residential, General Commercial, Neighborhood Commercial, Limited Industrial, Light Manufacturing and Public Facilities land uses and are zoned R1-1, R3-1VL, R3-1, [T][Q]C2-1VL-CDO, [Q]C2-1VL-CDO, [Q]CM-1VL-CDO, [Q]M2-1VL-CDO and PF-1XL. Surrounding properties are primarily developed with one-story single-family residential, two- to four-story multi-family residential and one- to two-story commercial buildings. North of the subject property is the Metro Expo Line and south of the subject property, across Colby Avenue, is a church.

The proposed project is considered an infill development in a neighborhood that is currently developed with residential and commercial uses.

The applicant has requested a 35% Density Bonus under concurrent Case No. DIR-2015-4086-DB-CDO-SPR to permit 129 residential condominium units. The proposed development is contingent upon approval of Case No. DIR-2015-4086-DB-CDO-SPR.

The property is located within 1.7 kilometers to the nearest fault (Santa Monica Fault).

The property is not located within an Airport Hazard area, the Coastal Zone, the Very High Fire Hazard Severity Zone, Fire District No. 1, a Flood Zone, a Watercourse, a Hazardous Waste/Border Zone, a Methane Hazard Site, a High Wind Velocity Area, the Special Grading Area (BOE Basic Grid Map A-13372), Oil Wells area, the Alquist-Priolo Fault Zone, a Landslide area, a Liquefaction Zone, a Preliminary Fault Rupture Study Area or a Tsunami Inundation Zone.

Therefore, as conditioned, the site is physically suitable for the proposed type of development.

(d) THE SITE IS PHYSICALLY SUITABLE FOR THE PROPOSED DENSITY OF DEVELOPMENT.

The adopted Palms - Mar Vista - Del Rey Community Plan designates the subject property for Neighborhood Office Commercial land uses, corresponding to the C1.5, C2, C4, RAS3 and RAS4 zones. The project site is zoned [Q]C2-1VL-CDO and R3-1 which would allow for a by-right density of 97 dwelling units (84 units within the [Q]C2 zoned portion of the property and 13 units within the R3 zoned portion of the property). The applicant is proposing to develop 129 residential condominium units.

The applicant has requested a 35% Density Bonus under concurrent Case No. DIR-2015-4086-DB-CDO-SPR to permit 129 residential condominium units. The proposed development is contingent upon approval of Case No. DIR-2015-4086-DB-CDO-SPR.

A mix of single- and multi-family residential and commercial uses make up the general character of the surrounding neighborhood. The surrounding properties consist of Low Residential, Medium Residential, General Commercial, Neighborhood Commercial, Limited Industrial, Light Manufacturing and Public Facilities land uses and are zoned R1-1, R3-1VL, R3-1, [T][Q]C2-1VL-CDO, [Q]C2-1VL-CDO, [Q]CM-1VL-CDO, [Q]M2-1VL-CDO and PF-1XL. Surrounding properties are primarily developed with one-story single-family residential, two- to four-story multi-family residential and one- to two-story commercial buildings. North of the subject property is the Metro Expo Line and south of the subject property, across Colby Avenue, is a church.

The site is not subject to the Specific Plan for the Management of Flood Hazards (floodways, floodplains, mud prone areas, coastal high-hazard and flood-related erosion hazard areas). The site is not within a very high fire hazard severity, toxic waste area, landslide area, or a preliminary fault rupture study area. The subject site is not located in a slope stability study area, high erosion hazard area, or Alquist-Priolo Fault Zone. The project has been approved contingent upon compliance with any requirements of the Department of Building and Safety, Grading Division.

Upon approval of Case No. DIR-2015-4086-DB-CDO-SPR, the proposed project with 129 residential condominium units complies with all L.A.M.C. requirements for density, parking, and yards. As conditioned, the proposed tract map is physically suitable for the proposed density of the development.

(e) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SUBSTANTIAL ENVIRONMENTAL DAMAGE OR SUBSTANTIALLY AND AVOIDABLY INJURE FISH OR WILDLIFE OR THEIR HABITAT.

The Department of City Planning issued Mitigated Negative Declaration No. ENV-2015-4087-MND on March 30, 2017. The Department found that potential negative impact could occur from the project's implementation due to the removal of protected trees and pedestrian safety.

The Deputy Advisory Agency certifies that Mitigated Negative Declaration No. ENV-2015-4087-MND reflects the independent judgment of the lead agency and determined that this project would not have a significant effect upon the environment provided the potential impacts identified above are mitigated to a less than significant level through implementation of Condition No. 29 of the Tract's approval. Other identified potential impacts not mitigated by these conditions are mandatorily subject to existing City ordinances, (Sewer Ordinance, Grading Ordinance, Flood Plain Management Specific Plan, Xeriscape Ordinance, Stormwater Ordinance, etc.) which are specifically intended to mitigate such potential impacts on all projects.

The project site, as well as the surrounding area are presently developed with structures and do not provide a natural habitat for either fish or wildlife.

In accordance with Section 21081.6 of the Public Resources Code (AB 3180), the Deputy Advisory Agency has assured that the above identified mitigation measures will be implemented by adopting the attached Mitigation Monitoring Program of ENV-2015-4087-MND.

(f) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SERIOUS PUBLIC HEALTH PROBLEMS.

The proposed subdivision, and subsequent improvements, are subject to the provisions of the Los Angeles Municipal Code (e.g., the Fire Code, Planning and Zoning Code, Health and Safety Code) and the Building Code. Other health and safety related requirements, as mandated by law, would apply where applicable to ensure the public health and welfare (e.g., asbestos abatement, seismic safety, flood hazard management).

The project is not located on a hazardous materials site, flood hazard area, nor is it located on a site having unsuitable soil conditions. The project would not place any occupants or residents near a hazardous materials site or involve the use or transport of hazardous materials or substances.

The area surrounding the property is fully developed with similar uses indicating that sewers and other services are available and adverse impacts to the public health or safety are not likely to occur as a result of the design and improvement of the site. Therefore, the design of the subdivision and the proposed improvements are not likely to cause serious public health problems.

(g) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS WILL NOT CONFLICT WITH EASEMENTS ACQUIRED BY THE PUBLIC AT LARGE FOR ACCESS THROUGH OR USE OF PROPERTY WITHIN THE PROPOSED SUBDIVISION.

According to the Bureau of Sanitation, there are no easements on the project site. Needed public access for roads and utilities will be acquired by the City prior to the recordation of the proposed tract. The project site contains a legally recorded lot as identified by Assessor Parcel Nos. 4260-036-042 and 4260-036-043. The site is surrounded by private properties that adjoin improved public streets and sidewalks designed and improved for the specific purpose of providing public access throughout the area. The project site does not adjoin or provide access to a public resource, natural habitat, public park, or any officially recognized public recreation area. Necessary public access for roads and utilities will be acquired by the City prior to recordation of the proposed map.

Therefore, the design of the subdivision and the proposed improvements would not conflict with easements acquired by the public at large for access through or use of property within the proposed subdivision.

(h) THE DESIGN OF THE PROPOSED SUBDIVISION WILL PROVIDE, TO THE EXTENT FEASIBLE, FOR FUTURE PASSIVE OR NATURAL HEATING OR COOLING OPPORTUNITIES IN THE SUBDIVISION. (REF. SECTION 66473.1)

In assessing the feasibility of passive or natural heating or cooling opportunities in the proposed subdivision design, the applicant has prepared and submitted materials which consider the local climate, contours, configuration of the parcel(s) to be subdivided and other design and improvement requirements.

Providing for passive or natural heating or cooling opportunities will not result in reducing allowable densities or the percentage of a lot which may be occupied by a building or structure under applicable planning and zoning in effect at the time the tentative map was filed.

The lot layout of the subdivision has taken into consideration the maximizing of the north/south orientation.

The topography of the site has been considered in the maximization of passive or natural heating and cooling opportunities.

In addition, prior to obtaining a building permit, the subdivider shall consider building construction techniques, such as overhanging eaves, location of windows, insulation, exhaust fans; planting of trees for shade purposes and the height of the buildings on the site in relation to adjacent development.

These findings shall apply to both the tentative and final maps for Vesting Tentative Tract Map No. 73891.

Vincent P. Bertoni, AICP
Advisory Agency

HENRY CHU
Deputy Advisory Agency

HC:ON:bk

Note: If you wish to file an appeal, it must be filed within 10 calendar days from the decision date as noted in this letter. For an appeal to be valid to the City Planning Commission, it must be accepted as complete by the City Planning Department and appeal fees paid, prior to expiration of the above 10-day time limit. Such appeal must be submitted on Master Appeal Form No. CP-7769 at the Department's Public Offices, located at:

Downtown	**San Fernando Valley**	**West Los Angeles**
Figueroa Plaza 201 North Figueroa Street, 4th Floor Los Angeles, CA 90012 (213) 482-7077	Marvin Braude San Fernando Valley Constituent Service Center 6262 Van Nuys Boulevard, Room 251 Van Nuys, CA 91401 (818) 374-5050	West Los Angeles Development Services Center 1828 Sawtelle Boulevard, 2nd Floor Los Angeles, CA 90025 (310) 231-2598

Forms are also available on-line at http://cityplanning.lacity.org/.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

If you have any questions, please call Development Services Center staff at (213) 482-7077, (310) 231-2598 or (818) 374-5050.

VESTING TENTATIVE TRACT NO.73891

BEING A SUBDIVISION OF LOT 3 OF TRACT NO. 22493, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 621 PAGE 15 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. AND LOTS 86 THROUGH 94 INCLUSIVE OF TRACT NO. 7888, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 85 PAGES 57 AND 58 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

FOR CONDOMINIUM PURPOSES

GRAPHIC SCALE

10 0 10 20 40

(IN FEET)
1 inch = 20 ft.

Date of Map: August 22, 2016

Date of Field Survey: June 30, 2015

Site Address: 11460 W Gateway Boulevard, Los Angeles, CA 90064

Project Description: A Tentative Tract Map for the merger and resubdivision of a public alley and the creation of a 1 Lot subdivision with 129 residential condominiums.

A.P.N.: 4260-036-043 & 4260-036-042

Thomas Guide Page: 632-B-7

Existing Legal Description:

Parcel 1:
Lot 3 of Tract No. 22493, in the City of Los Angeles, County of Los Angeles, State of California, as per map recorded in Book 621 Page 15 of Maps, in the office of the County Recorder of said County.

Parcel 2:
Lots 86 through 94 of Tract No. 7888, in the City of Los Angeles, County of Los Angeles, State of California, as per map recorded in Book 85 Pages 57 and 58 of Maps, in the office of the County Recorder of said County.

Area: (Existing Gross)
Existing Parcel 1 ([Q]C2-1VL-CDO) = 32,572 Square Feet
Existing Parcel 2 (R3-1) = 8,256 Square Feet
Total = 40,828 Square Feet, 0.94 Acres

Net Area: (Gross less existing street easements)
Existing Parcel 1 ([Q]C2-1VL-CDO) = 31,614 Square Feet
Existing Parcel 2 (R3-1) = 7,842 Square Feet
Total = 39,456 Square Feet, 0.91 Acres

Proposed Right of Way Vacation Area = 3,748 Square Feet (1,859 sq.ft. R3-1, 1,889 sq.ft. [Q]C2-1VL-CDO)

Proposed Net Area: (Existing Net Area adding Proposed Vacation) = 43,204 Square Feet, 0.99 Acres

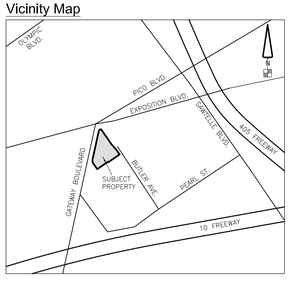
Existing/Proposed Zoning: [Q]C2-1VL-CDO and R3-1
Community Plan: Palms – Mar Vista – Del Rey
Specific Plan Area: West Los Angeles Transportation Improvement and Mitigation
West Pico Boulevard Community Design Overlay
Census Tract No: 2712.00
District Map No: 123B153

Benchmark: The elevation of 159.97 on Bench Mark no. 13-11450 (wire spk in N curb Pico Bl.; 11' E of Federal Ave.) NAVD 1988 datum, 2000 adjustment, as shown in the City of Los Angeles Navigate LA. Database was used as datum for this survey.

Flood Zone: This property lies within Zone "X" as shown on Firm Map number 06037C1590F dated September 26, 2008. areas determined to be outside the 0.2% annual chance floodplain

Note:
- Residential Condominium subdivision in the [Q]C2-1VL-CDO and R3-1 zones
- Boundary shown hereon is per field measurements
- Existing site improvements TBR
- Proposed structures shown hereon are approximate
- There are 2 protected trees on the site, please see tree report and tree map.
- For the construction, use and maintenance of a Single Lot Tract Map Subdivision containing a 5-story residential building comprised of 129 residential condominium units, with 2 levels of subterranean residential parking.
- Sewers are in and available
  Central onsite trash collection
- Utility information shown hereon is per record data and is only as accurate as said data.
- Not in a Hillside Grading Area
- Not in a Geologic/Flood/Special Hazard Area

Vicinity Map



Subdivider:

11460 Gateway, LLC
15300 Ventura Blvd., Suite 416
Sherman Oaks, CA 91403

Survey Prepared By:

Hahn and Associates, Inc.
26074 Avenue Hall, Suite 2
Santa Clarita, CA 91355
(661) 775-9500

HAHN AND ASSOCIATES, INC.

LICENSED LAND SURVEYOR
BRANDON M. HAHN
EXP. 12-31-17
NO. LS 7582
STATE OF CALIFORNIA

HAHN JOB NO.: 0040-15-001

Exhibit B

Appeal Application

ORIGINAL

APPLICATIONS:

APPEAL APPLICATION

This application is to be used for any appeals authorized by the Los Angeles Municipal Code (LAMC) for discretionary actions administered by the Department of City Planning.

1. APPELLANT BODY/CASE INFORMATION

Appellant Body:

☐ Area Planning Commission ☑ City Planning Commission ☑ City Council ☐ Director of Planning

Regarding Case Number: Vesting Tentative Tract Map No. 73891 (Related Case# DIR-2015-4086-DB-CDO-SPR)

Project Address: 11460-11388 WestGateway Blvd, 2426 South Colby Ave, 2425 South Butler Ave, LA, CA 90064

Final Date to Appeal: 07/07/2017

Type of Appeal:
☐ Appeal by Applicant/Owner
☑ Appeal by a person, other than the Applicant/Owner, claiming to be aggrieved
☐ Appeal from a determination made by the Department of Building and Safety

2. APPELLANT INFORMATION

Appellant's name (print): JOSEPH NGUYEN

Company: ST. JOHN OF ARC CHURCH

Mailing Address: 11534 GATEWAY BLVD

City: Los Angeles State: CA Zip: 90064

Telephone: 310 479-5111 E-mail: office@stjohnofarcchurch.com

- Is the appeal being filed on your behalf or on behalf of another party, organization or company?

  ☐ Self ☑ Other: ALL NEIGHBORS FROM COLBY AVE, & BUTLER AVE, AROUND ALLEY

- Is the appeal being filed to support the original applicant's position? ☐ Yes ☑ No

3. REPRESENTATIVE/AGENT INFORMATION

Representative/Agent name (if applicable): _____

Company: _____

Mailing Address: _____

City: _____ State: _____ Zip: _____

Telephone: _____ E-mail: _____

4. JUSTIFICATION/REASON FOR APPEAL

Is the entire decision, or only parts of it being appealed? ☑ Entire ☐ Part

Are specific conditions of approval being appealed? ☑ Yes ☐ No

If Yes, list the condition number(s) here: 1, 3, 3a, 3c, 10d, 22, 23

Attach a separate sheet providing your reasons for the appeal. Your reason must state:

- The reason for the appeal
- How you are aggrieved by the decision
- Specifically the points at issue
- Why you believe the decision-maker erred or abused their discretion

5. APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true:

Appellant Signature: _____ Date: 7,7,2017

6. FILING REQUIREMENTS/ADDITIONAL INFORMATION

- Eight (8) sets of the following documents are required for each appeal filed (1 original and 7 duplicates):
  - Appeal Application (form CP-7769)
  - Justification/Reason for Appeal
  - Copies of Original Determination Letter
- A Filing Fee must be paid at the time of filing the appeal per LAMC Section 19.01 B.
  - Original applicants must provide a copy of the original application receipt(s) (required to calculate their 85% appeal filing fee).
- All appeals require noticing per the applicable LAMC section(s). Original Applicants must provide noticing per the LAMC, pay mailing fees to City Planning's mailing contractor (BTC) and submit a copy of the receipt.
- Appellants filing an appeal from a determination made by the Department of Building and Safety per LAMC 12.26 K are considered Original Applicants and must provide noticing per LAMC 12.26 K.7, pay mailing fees to City Planning's mailing contractor (BTC) and submit a copy of receipt.
- A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.
- Appeals of Density Bonus cases can only be filed by adjacent owners or tenants (must have documentation).
- Appeals to the City Council from a determination on a Tentative Tract (TT or VTT) by the Area or City Planning Commission must be filed within 10 days of the date of the written determination of said Commission.
- A CEQA document can only be appealed if a non-elected decision-making body (ZA, APC, CPC, etc.) makes a determination for a project that is not further appealable. [CA Public Resources Code ' 21151 (c)].

This Section for City Planning Staff Use Only		
Base Fee: 89.00	Reviewed & Accepted by (DSC Planner): JOHN DACEY	Date: 7/7/17
Receipt No: 38379	Deemed Complete by (Project Planner):	Date:
☑ Determination authority notified	☐ Original receipt and BTC receipt (if original applicant)	

June 23, 2017

PETITION TO STOP TAKING OVER THE ALLEYWAY FOR 11460 GATEWAY PROJECT

Case# DIR-2015-4086-DB-CDO-SPR

Location:
11460-11488 West Gateway Blvd,
2426 South Colby Ave.
2425 South Butler Ave.

To whom it may concern:

We, neighbors from Colby Avenue and Butler Avenue, are writing to you today, June 23rd, ahead of your scheduled appeal due date, July 6th, to share the thoughts of neighbors who **vehemently disagree with giving out our public right of our alley way between Colby Avenue and Butler Avenue.** We are writing to you as constituents of Council District 11 to state our opposition in regards to a proposed development at 11460 Gateway Blvd. This project referred to as the "Gateway Project" calls for re-development of what is currently a plaza consisting of auto shops and the Tacomiendo restaurant into a 5-story and 129 unit apartment building.

The developer plans on taking over the alleyway between Colby Avenue and Butler Avenue, as a location to build their project. By these means, they are taking advantage of not having required city setbacks near the alley. Furthermore, by combining the two lots facing the alley they are increasing their lot size, and therefore they are presenting their FAR(2.24:1) instead of the reality of their poroposal design which is FAR(5:1). Thus, they should only be capable of constructing a 2 to 3-story building but not this 5-story proposed building without invading our alleyway. The neighbors of Colby Avenue and Butler Avenue strongly oppose the construction of this building. Additionally, they are wanting to provide parking spaces under the alleyway in their design so that they can build more units in order to construct a 5-story building instead of the allowed 2 to 3-story building. This proposed project is massive, and unbelievably dense compare to all other projects with the same lot size or even larger, and will have severe negative impacts in our residential R1 zone neighborhood.

We completely object and oppose the city giving away public property to a private developer for a private project and for helping them constructing this dense 5-story building. The developer should not be allowed to take away the alley to boost their own benefits and harm other properties on these two streets. **We completely oppose the proposed height, high number of units, density and bonus density.**

Having an alley is the legal right of all the people who live on Colby and Butler Avenue, not just this developer. **The alley should remain as is, not vacant, nor dead-end**, and should be

kept as part of the city property for future city planning developments and remain accessible for both the neighbors and the city. **The developers of this project should scale down the project to a size that will not require the use of the alleyway, but by no means is the city obligated to nor should the city give away the alleyway, legal public right of way of Colby and Butler avenue neighbors, to the developers.**

We ask for your careful consideration in regards to this matter and that you oppose the notion of giving away public property to serve the needs of private developers.

Thank you.

Signatures of neighbors of Colby Avenue and Butler Avenue:

SHULAMIT WYNER — [signature] — St. Joan of Arc Church 100

[signature] — Aliakbar Mirshafiei 2436 Colby Ave.

[signature] — Edward Rhodes 2446 Colby Ave

[signature] — CHRIS ONO 2464 COLBY AVE

William C. Kirk — William C. Kirk 2470 Colby Ave

[signature] — KYLE MORRISON 2482 COLBY AVE.

[signature] — Mehrdad Barnadjian 2432 COLBY

[signature] — Mozafar Barnadjian 2432 COLBY

[signature] — Micheline Newton 2498 Colby

Velia & Edward Herrera 2440 Colby ave LA

[signature] — FRED ERIC LE 2496 colby

Paul Desjardins — PAUL DESJARDINS 2482 COLBY AVE

Raul Hernandez — Raul Hernandez 2488 colby Ave

Signatures of neighbors of Colby Avenue and Butler Avenue:

Elena K. Legagpi	2499 Butler Ave. W.L.A. CA 90064
JAMES GREENS	2491 Butler Ave LA 90064
	2467 Butler Ave. 90064
Chris Peerson	2467 Butler Ave 90064
MARCUS SAKAMOTO	2457 Butler Ave
	2451 Butler Ave.
	2447 Butler Ave
Angel Delvna	2451 Colby Ave
	213-840-1467
Anne Kurosumi	2463 Colby Ave. L.A CA 90064
	2469 Colby Ave L.A. Ca 90064
	2497 Colby AVE
Lisa McDonnell	2457 Colby Ave 90064
	2452 Colby ave, LA 90064
Philip Vigil	2457 Colby Ave, LA 90064
	1145 Gateway blvd. LA 90064

Signatures of neighbors of Colby Avenue and Butler Avenue:

Theresa Valencia	THERESA VALENCIA	2492 COLBY Ave L.A. CA. 90064
[illegible]	OSORIO, May	2498 BUTLER AVE L.A CA
	Marcela Clemm	2495 Butler Ave CA 90064
SHANE N WHITE	[illegible]	2481 BUTLER AVE LA CA 90064
Angelica Song	[illegible]	2481 Butler Ave CA CA 90064
Gayle Gould	Gayle Gould	2461 Butler Ave LA 90064
Wes Shive	[illegible]	2437 Butler Ave
Roberto Munoz	[illegible]	2432 Butler Ave. 90064
Elizabeth Ocampo	[illegible]	
KURT Knecht	[illegible]	2442 Butler Ave
PATRICIA KELLER	Patricia Keller	2471 BUTLER AVE
KATHRYN ALLEN	K Allen	2471 BUTLER AVE LA CA 90064
PAUL FITZGERALD	Paul FitzGerald	2448 BUTLER AVE
Cameron Nefiz	[illegible]	2478 Butler ave 818-231-7371
AIDA YAMINY	[illegible]	2487 BUTLER AVE 310-477-4791

Exhibit C

ENV-2015-4087-MND and Mitigation Monitoring Program for ENV-2015-4087-MND

City of Los Angeles

Department of City Planning

City Hall • 200 N. Spring Street, Room 763 • Los Angeles, CA 90012

INITIAL STUDY/PROPOSED MITIGATED NEGATIVE DECLARATION

Palms-Mar Vista-Del Rey Community Plan Area

11460 Gateway Boulevard Project

Case Numbers: ENV-2015-4087-MND; DIR-2015-4086-DB-CDO-SPR; VTT-73891

Project Location: *11460–11488 W. Gateway Blvd; 2426 S. Colby Ave; 2425 S. Butler Ave, Los Angeles, CA 90064*

Council District: *11 – Mike Bonin*

Project Description: *The Project would involve the demolition of the existing commercial land uses and on-site surface parking lot areas, and the construction of a multi-family residential building containing 129 dwelling units over a 2-level subterranean parking structure. The proposed approximately 88,160-square-foot building would consist of 5 stories and a maximum height of 56 feet. A total of 154 vehicle parking stalls and 146 bicycle parking spaces would be provided on site to serve the Project. The residential dwelling units would consist of 63 studio units, 60 one-bedroom units, and 6 two-bedroom units; and the Project would set aside 15 dwelling units as affordable housing for Very Low Income households. Approximately 17,766 square feet of on-site open space is proposed. The Project Applicant is requesting ministerial and discretionary approvals as part of the Project, including without limitation:*

(a) Vesting Tentative Tract Map to create a one-lot subdivision, including the merger and vacation of public alley right-of-way to create 129 residential condominiums and a determination of yards by the Advisory Agency to allow Gateway Boulevard and Colby Avenue as Front Yards and all other yards as Side Yards;

(b) Density Bonus and Affordable Housing On-Menu Incentives;

(c) West Pico Boulevard Community Design Overlay Plan Approval;

(d) Site Plan Review;

(e) Advisory Agency approval for removal of protected and non-protected trees;

(f) Street Tree Removal Permit;

(g) Haul route approval (if required);

(h) Demolition, grading, excavation, and building permits; and

(i) Other permits, ministerial or discretionary, as may be necessary pursuant to various sections of the LAMC from the City of Los Angeles Department of Building and Safety (and other municipal agencies) in order to execute and implement the Project.

APPLICANT:	***PREPARED BY:***	***ON BEHALF OF:***
11460 Gateway, LLC	*EcoTierra Consulting, Inc.*	*The City of Los Angeles Department of City Planning*

March 2017

11460 Gateway Boulevard Project

11460, 11464, 11468, 11470, 11472, 11476, 11480, 11484, 11488 W. GATEWAY BOULEVARD
2426 S. COLBY AVENUE
2425 S. BUTLER AVENUE

INITIAL STUDY/PROPOSED MITIGATED NEGATIVE DECLARATION

PREPARED FOR:
The City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

APPLICANT:
11460 Gateway, LLC
15300 Ventura Boulevard, Suite 405
Sherman Oaks, CA 91403

PREPARED BY:
EcoTierra Consulting, Inc.
555 W. 5th Street, 31st Floor
Los Angeles, CA 90013

March 2017

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CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
PROPOSED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY:		**COUNCIL DISTRICT:**
City of Los Angeles		11 – Mike Bonin
PROJECT TITLE:	**ENVIRONMENTAL CASE:**	**CASE NO.**
11460 Gateway Boulevard Project	ENV-2015-4087-MND	DIR-2015-4086-DB-CDO-SPR VTT-73891

PROJECT LOCATION: 11460 – 11488 W. Gateway Blvd, 2426 S. Colby Ave, 2425 S. Butler Ave

PROJECT DESCRIPTION: The Project would involve the demolition of the existing commercial land uses and on-site surface parking lot areas, and the construction of a multi-family residential building containing 129 dwelling units over a 2-level subterranean parking structure. The proposed approximately 88,160-square-foot building would consist of 5 stories and a maximum height of 56 feet. A total of 154 vehicle parking stalls and 146 bicycle parking spaces would be provided on site to serve the Project. The residential dwelling units would consist of 63 studio units, 60 one-bedroom units, and 6 two-bedroom units; and the Project would set aside 15 dwelling units as affordable housing for Very Low Income households. Approximately 17,766 square feet of on-site open space is proposed. The Project Applicant is requesting ministerial and discretionary approvals as part of the Project, including without limitation: (a) Vesting Tentative Tract Map to create a one-lot subdivision, including the merger and vacation of public alley right-of-way to create 129 residential condominiums and a determination of yards by the Advisory Agency to allow Gateway Boulevard and Colby Avenue as Front Yards and all other yards as Side Yards; (b) Density Bonus and Affordable Housing On-Menu Incentives; (c) West Pico Boulevard Community Design Overlay Plan Approval; (d) Site Plan Review; (e) Advisory Agency approval for removal of protected and non-protected trees; (f) Street Tree Removal Permit; (g) Haul route approval (if required); (h) Demolition, grading, excavation, and building permits; and (i) Other permits, ministerial or discretionary, as may be necessary pursuant to various sections of the LAMC from the City of Los Angeles Department of Building and Safety (and other municipal agencies) in order to execute and implement the Project. Such approvals may include, but are not limited to landscaping plan approvals, stormwater discharge permits, permits for temporary street closures, installation and hookup approvals for public utilities, haul route approvals, and related permits.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
11460 Gateway, LLC
15300 Ventura Boulevard, Suite 405
Sherman Oaks, California 91403

FINDING: The Department of City Planning of the City of Los Angeles has proposed that a mitigated negative declaration be adopted for this Project. The mitigation measures outlined on the attached pages will reduce any potentially significant adverse effects to a level of insignificance.

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED

Any written comment received during the public review period are attached together with the response of the Lead City Agency. The Project decision-maker may adopt the mitigated negative declaration, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING FORM	**TITLE**	**TELEPHONE NUMBER**
Oliver Netburn	City Planning Associate	(213) 978-1382
ADDRESS	**SIGNATURE (Official)**	**DATE**
200 N. Spring Street, Room 763 Los Angeles, California 90012	Nicholas Hendricks	March 30, 2017

CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK

ROOM 395, CITY HALL

LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY and CHECKLIST (CEQA Guidelines Section 15063)

LEAD CITY AGENCY:	**COUNCIL DISTRICT:**	**DATE:**
City of Los Angeles	11 – Mike Bonin	March 30, 2017
RESPONSIBLE AGENCIES: Department of City Planning		
ENVIRONMENTAL CASE: ENV-2015-4087-MND	**RELATED CASES:** DIR-2015-4086-DB-CDO-SPR VTT-73891	
PREVIOUS ACTIONS CASE NO. N/A	❑ DOES have significant changes from previous actions. ❑ DOES NOT have significant changes from previous actions.	

PROJECT DESCRIPTION:

Vesting Tentative Tract Map to create a one-lot subdivision, including the merger and vacation of public alley right-of-way to create 129 residential condominiums and a determination of yards by the Advisory Agency to allow Gateway Boulevard and Colby Avenue as Front Yards and all other yards as Side Yards; Density Bonus and Affordable Housing On-Menu Incentives; West Pico Boulevard Community Design Overlay Plan Approval; Site Plan Review; Advisory Agency approval for removal of protected and non-protected trees; Street Tree Removal Permit; Haul route approval (if required); Demolition, grading, excavation, and building permits; and Other permits, ministerial or discretionary, as may be necessary pursuant to various sections of the LAMC from the City of Los Angeles Department of Building and Safety (and other municipal agencies) in order to execute and implement the Project. Such approvals may include, but are not limited to landscaping plan approvals, stormwater discharge permits, permits for temporary street closures, installation and hookup approvals for public utilities, haul route approvals, and related permits.

ENV PROJECT DESCRIPTION:

The Project would involve the demolition of the existing commercial land uses, and the construction of an approximately 88,160-square-foot multi-family residential building containing 129 dwelling units over a 2-level subterranean parking structure. The proposed building would consist of 5 stories and would be a maximum of 56 feet tall. A total of 154 vehicle parking stalls and 146 bicycle parking spaces would be provided on site to serve the Project. The residential dwelling units would consist of 63 studio units, 60 one-bedroom units, and 6 two-bedroom units; and the Project would set aside 15 dwelling units as affordable housing for Very Low Income households. Approximately 17,766 square feet of on-site open space is proposed.

ENVIRONMENTAL SETTING:

The approximately 43,204-square-foot (0.99 acre) Project site comprises two parcels (APN 4260-036-042 and -043) and public alley right-of-way at the southeast corner of Gateway Boulevard and Exposition Boulevard/Pico Boulevard in the Palms-Mar Vista-Del Rey Community Plan Area. (The alley would be vacated and merged into the Project site as part of the Project.) The Project site is relatively flat and entirely developed with approximately 14,594 square feet of commercial land uses, which include a dry cleaner, restaurant, automotive service facilities, and tire store, and associated surface parking lots. The Project site is located within an urbanized setting in the West Los Angeles area of the City. The surrounding area is characterized by commercial, residential, and warehouse/storage uses. Land uses that immediately surround the Project site include an adult-oriented commercial use to the north and east, single- and multi-family residential land uses to the east and south, and Colby Avenue and Gateway Boulevard to the west. The Metro Rail Expo Line is adjacent to the Project site, approximately 115 feet to the north.

PROJECT LOCATION: 11460 – 11488 W. Gateway Boulevard, 2426 S. Colby Avenue, 2425 S. Butler Avenue

COMMUNITY PLAN AREA:		AREA PLANNING COMMISSION:	CERTFIED NEIGHBORHOOD COUNCIL:
Palms-Mar Vista-Del Rey **STATUS:** ☐ Preliminary ☐ Proposed ☒ ADOPTED in 1997	☐ Does Conform to Plan ☐ Does NOT Conform to Plan	West Los Angeles	West Los Angeles

EXISTING ZONING:	MAX DENSITY ZONING:	LA River Adjacent:
[Q]C2-1VL-CDO & R3-1	FAR 1.5:1 (in [Q]C2-1VL-CDO) FAR 3:1 (in R3-1)	No
GENERAL PLAN LAND USE: General Commercial	**MAX. DENSITY PLAN:** FAR 3:1	
	PROJECT DENSITY: 2.24:1 (averaged maximum requested)	

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.

Signature	Title	Phone
	City Planning Associate	(213) 978-1382

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:
   a. Earlier Analysis Used. Identify and state where they are available for review.
   b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c. Mitigation Measures. For effects that are "Less Than Significant With Mitigation 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:
   a. The significance criteria or threshold, if any, used to evaluate each question; and
   b. The mitigation measure identified, if any, to reduce the impact to less than significant.

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**	❑ **GREENHOUSE GAS EMISSIONS**	❑ **POPULATION AND HOUSING**
❑ **AGRICULTURE AND FORESTRY RESOURCES**	❑ **HAZARDS AND HAZARDOUS MATERIALS**	❑ **PUBLIC SERVICES**
❑ **AIR QUALITY**	❑ **HYDROLOGY AND WATER QUALITY**	❑ **RECREATION**
❑ **BIOLOGICAL RESOURCES**	❑ **LAND USE AND PLANNING**	❑ **TRANSPORTATION/TRAFFIC**
❑ **CULTURAL RESOURCES**	❑ **MINERAL RESOURCES**	❑ **TRIBAL CULTURAL RESOURCES**
❑ **GEOLOGY AND SOILS**	❑**NOISE**	❑ **UTILITIES**
		❑ **MANDATORY FINDINGS OF SIGNIFICANCE**

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

Background

PROPONENT NAME:
11460 Gateway, LLC

PHONE NUMBER:
(818) 334-2544

APPLICANT ADDRESS:
15300 Ventura Boulevard, Suite 405
Sherman Oaks, California 91403

AGENCY REQUIRING CHECKLIST:
Department of City Planning

DATE SUBMITTED:
November 6, 2015

PROPOSAL NAME (If Applicable):
11460 Gateway Boulevard Project

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
PLEASE NOTE THAT EACH AND EVERY RESPONSE IN THE CITY OF LOS ANGELES INITIAL STUDY AND CHECKLIST IS SUMMARIZED FROM AND BASED UPON THE ENVIRONMENTAL ANALYSIS CONTAINED IN SECTION III OF THIS INITIAL STUDY. PLEASE REFER TO THE APPLICABLE RESPONSE IN SECTION III FOR A DETAILED DISCUSSION OF CHECKLIST DETERMINATIONS.					
I.	**AESTHETICS**				
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?	❑	❑	☒	❑
II.	**AGRICULTURE AND FORESTRY RESOURCES**				
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 WITH 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 1220(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?	❑	❑	❑	☒
III.	**AIR QUALITY**				
a.	CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE SCAQMD OR CONGESTION MANAGEMENT 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 AIR BASIN IS NON-ATTAINMENT (OZONE, CARBON MONOXIDE, & PM 10) UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD?	❑	❑	☒	❑
d.	EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS?	❑	❑	☒	❑
e.	CREATE OBJECTIONABLE ODORS AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE?	❑	❑	☒	❑
IV.	**BIOLOGICAL RESOURCES**				
a.	HAVE A SUBSTANTIAL ADVERSE EFFECT, EITHER DIRECTLY OR THROUGH HABITAT MODIFICATION, ON ANY SPECIES IDENTIFIED AS	❑	❑	❑	☒

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	A CANDIDATE, SENSITIVE, OR SPECIAL STATUS SPECIES IN LOCAL OR REGIONAL PLANS, POLICIES, OR REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE 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 WILDLIFE 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?	❑	❑	❑	☒
V.	**CULTURAL RESOURCES**				
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?	❑	❑	☒	❑
VI.	**GEOLOGY AND SOILS**				
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?	❑	❑	☒	❑

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	❑	❑	❑	☒
VII.	**GREENHOUSE GAS EMISSIONS**				
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 GREENHOUSE GASES?	❑	❑	❑	☒
VIII.	**HAZARDS AND HAZARDOUS MATERIALS**				
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?	❑	❑	❑	☒
IX.	**HYDROLOGY AND WATER QUALITY**				
a.	VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE	❑	❑	☒	❑

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	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 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?	❑	❑	❑	☒
X.	**LAND USE AND PLANNING**				
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?	❑	❑	❑	☒
XI.	**MINERAL RESOURCES**				
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?	❑	❑	❑	☒
XII.	**NOISE**				
a.	EXPOSURE OF PERSONS TO OR GENERATION OF NOISE IN LEVEL IN	❑	❑	☒	❑

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	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?	❑	❑	❑	☒
XIII.	**POPULATION AND HOUSING**				
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?	❑	❑	❑	☒
XIV.	**PUBLIC SERVICES**				
a.	FIRE PROTECTION?	❑	❑	☒	❑
b.	POLICE PROTECTION?	❑	❑	☒	❑
c.	SCHOOLS?	❑	❑	☒	❑
d.	PARKS?	❑	❑	☒	❑
e.	OTHER PUBLIC FACILITIES?	❑	❑	☒	❑
XV.	**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?	❑	❑	❑	☒

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI.	**TRANSPORTATION/TRAFFIC**				
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 REGARDING PUBLIC TRANSIT, BICYCLE, OR PEDESTRIAN FACILITIES, OR OTHERWISE DECREASE THE PERFORMANCE OR SAFETY OF SUCH FACILITIES?	❑	❑	☒	❑
XVII.	**TRIBAL CULTURAL RESOURCES**				
WOULD THE PROJECT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A TRIBAL CULTURAL RESOURCE, DEFINED IN PUBLIC RESOURCES CODE SECTION 21074 AS EITHER A SITE, FEATURE, PLACE, CULTURAL LANDSCAPE THAT IS GEOGRAPHICALLY DEFINED IN TERMS OF THE SIZE AND SCOPE OF THE LANDSCAPE, SACRED PLACE, OR OBJECT WITH CULTURAL VALUE TO A CALIFORNIA NATIVE AMERICAN TRIBE, AND THAT IS:				
a.	LISTED OR ELIGIBLE FOR LISTING IN THE CALIFORNIA REGISTER OF HISTORICAL RESOURCES, OR IN A LOCAL REGISTER OF HISTORICAL RESOURCES AS DEFINED IN PUBLIC RESOURCES CODE SECTION 5020.1(K)?	❑	❑	☒	❑
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.	❑	❑	☒	❑
XVIII.	**UTILITIES**				
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?	❑	❑	❑	☒

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	❑	❑	☒	❑
XIX.	**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?	❑	❑	☒	❑

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

The Environmental Impact Assessment includes the use of official City of Los Angeles and other government source reference materials related to various environmental impact categories (e.g., Hydrology, Air Quality, Biology, Cultural Resources, etc.). The State of California, Department of Conservation, Division of Mines and Geology – Seismic Hazard Maps and reports, are used to identify potential future significant seismic events; including probable magnitudes, liquefaction, and landslide hazards. Based on Applicant information provided in the Master Land Use Application and Environmental Assessment Form, impact evaluations were based on stated facts contained therein, including but not limited to, reference materials indicated above, field investigation of the project site, and other reliable reference materials known at the time.

Project specific impacts were evaluated based on all relevant facts indicated in the Environmental Assessment Form and expressed through the Applicant's Project description and supportive materials. Both the Initial Study Checklist and Checklist Explanations, in conjunction with the City of Los Angeles's Adopted Thresholds Guide and CEQA Guidelines, were used to reach reasonable conclusions on environmental impacts as mandated under the California Environmental Quality Act (CEQA).

The Project as identified in the Project description may cause potentially significant impacts on the environment without mitigation. Therefore, this environmental analysis concludes that a Mitigated Negative Declaration shall be issued to avoid and mitigate all potential adverse impacts on the environment by the imposition of mitigation measures and/or conditions contained and expressed in this document; the environmental case file known as ENV-2015-4087-MND and the associated case(s), DIR-2015-4086-DB-CDO-SPR and VTT-73891. Finally, based on the fact that these impacts can be feasibly mitigated to less than significant, and based on the findings and thresholds for Mandatory Findings of Significance as described in the California Environmental Quality Act, section 15065, the overall Project impacts(s) on the environment (after mitigation) **will not**:

- Substantially degrade environmental quality.
- Substantially reduce fish or wildlife habitat.
- Cause a fish or wildlife habitat to drop below self sustaining levels.
- Threaten to eliminate a plant or animal community.
- Reduce number, or restrict range of a rare, threatened, or endangered species.
- Eliminate important examples of major periods of California history or prehistory.
- Achieve short-term goals to the disadvantage of long-term goals.
- Result in environmental effects that are individually limited but cumulatively considerable.
- Result in environmental effects that will cause substantial adverse effects on human beings.

ADDITIONAL INFORMATION:

All supporting documents and references are contained in the Environmental Case File referenced above and may be viewed in Room 763, City Hall.

For City information, addresses, and phone numbers: visit the City's website at http://www.lacity.org; City Planning- and Zoning Information Mapping Automated System (ZIMAS) cityplanning.lacity.org/. Seismic Hazard Maps – http://gmw.consrv.ca.gov/shmp/, Engineering/Infrastructure/Topographic Maps/Parcel Information – http://navigatela.lacity.org/navigatela/

PREPARED BY:	**TITLE:**	**TELEPHONE NO.:**	**DATE:**
Oliver Netburn	City Planning Associate	(213) 978-1382	March 30, 2017

MITIGATION MEASURES

Biological Resources (Significant and Protected Tree Removal)

MM 4-1. Removal or planting of trees in the public right-of-way and/or removal of all protected trees shall require approval by the Board of Public Works and the Advisory Agency in the course of reviewing and approving the Vesting Tentative Tract Map, and shall adhere to the following measures:

- Prior to the issuance of any permit, the required Tree Report and plot plan shall indicate the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way and shall be submitted for review and approval to the Urban Forestry Division of the Bureau of Street Services, Department of Public Works.

Regarding the Significant Street Trees:

- All significant trees (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) on the site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree.

- A Landscape Plan shall be prepared, indicating the location of all replacement trees, to the satisfaction of the decision-maker. Net, new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.

- All trees in the public right-of-way shall be provided per the current standards of the Urban Forestry Division of the Department of Public Works, Bureau of Street Services.

Regarding the Protected On-Site Trees:

- A minimum of two (2) trees (each with a minimum of 15 gallons measuring 1-inch in diameter and at least 7 feet in height measured from the base) of a protected species variety shall be planted for each protected tree that is removed. The canopy of the replacement trees, at the time they are planted, shall be in proportion to the canopies of the protected trees removed and shall be to the satisfaction of the Advisory Agency and the Urban Forestry Division.

- The location of the trees planted for the purposes of replacing a removed protected tree shall be clearly indicated on the required Landscape Plan, which shall also indicate the replacement tree species and further contain the phrase "Replacement Tree" in its description.

- The Project Applicant shall post a cash bond or other assurances acceptable to the Bureau of Engineering in consultation with the Urban Forestry Division and the decision-maker guaranteeing the survival of trees required to be maintained, replaced, or relocated in such a fashion as to assure the existence of continuously living trees for a minimum of three (3) years from the date that the bond is posted or from the date such trees are replaced or relocated, whichever is longer. Any change of ownership shall require that the new owner post a new protected tree bond to the satisfaction of the Bureau of Engineering. Subsequently, the original owner's protected tree bond may be exonerated.

The City Engineer shall use the provisions of Section 17.08 as its procedural guide in satisfaction of said bond requirements and processing. Prior to exoneration of the bond, the owner of the property shall provide evidence satisfactory to the City Engineer and Urban Forestry Division that the protected trees were properly replaced, the date of the replacement, and the survival of the replacement trees for a period of three (3) years.

Transportation/Traffic (Hazards)

MM 16-1. The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times. Specifically, this measure shall include the following:

- Temporary pedestrian facilities shall be adjacent to the Project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

REGULATORY COMPLIANCE MEASURES

Air Quality

RCM 3-1. All unpaved construction areas shall be wetted at least three times daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 61 percent.

RCM 3-2. In conjunction with RCM 8-1, the Project shall comply with all requirements established in SCAQMD Rule 402 (Public Nuisance) and Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil). Specifically, an approved mitigation plan must be obtained from the SCAQMD prior to the excavation or grading of soil containing VOC material including gasoline, diesel, crude oil, lubricant, waste oil, adhesive, paint, stain, solvent, resin, monomer, and/or any other material containing VOC; and/or prior to the handling or storage of VOC contaminated soil, defined as soil which registers 50 parts per million (ppm) or greater using an organic vapor analyzer (OVA) calibrated with hexane.

Cultural Resources

RCM 5-1. If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the proposed Project shall not collect or move any archaeological materials and

associated materials. Construction activity may continue unimpeded on other portions of the Project site. 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.

RCM 5-2. 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.

RCM 5-3. If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

- Stop immediately and contact the County Coroner:
  1104 N. Mission Road
  Los Angeles, CA 90033
  323-343-0512 (8 AM to 5 PM Monday through Friday) or
  323-343-0714 (after hours, Saturday, Sunday, and holidays)

If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.

- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.

- If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

Geology and Soils

RCM 6-1. The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

RCM 6-2. Prior to the issuance of grading or building permits, the Applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report shall assess soil and geologic conditions at the site and include building design recommendations. The Project shall comply with the conditions contained in the approved geotechnical report and within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed Project, and as it may be subsequently amended or modified.

Hazards and Hazardous Materials

RCM 8-1. In conjunction with RCM 3-2, prior to the issuance of any use of land, grading, or building permit, the Applicant shall obtain a sign-off from the City of Los Angeles Fire Department indicating that all on-site hazardous materials, including contamination of the soil (from tetrachloroethene [PCE] and trichloroethene [TCE]), have been suitably remediated.

Noise

RCM 12-1. The Project shall comply with the City of Los Angeles Noise Ordinance and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

Public Services

RCM 14-1. Prior to plan check review, the Project Applicant shall consult with the City of Los Angeles Fire Department regarding the installation of public and/or private fire hydrants, sprinklers, access, and/or other fire protection features within the Project. All required fire protection features shall be installed to the satisfaction of the City of Los Angeles Fire Department.

RCM 14-2. Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to minimize trespassing, vandalism, short-cut attractions and other nuisances.

RCM 14-3. The plans shall incorporate the design guidelines 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. Please refer to *Design Out Crime Guidelines: Crime Prevention Through Environmental Design* published by the City of Los Angeles Police Department's Crime Prevention Section, (213) 485-3134. These measures shall be approved by the City of Police Department prior to the issuance of building permits.

RCM 14-4. 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 Applicant has paid all applicable school facility development fees in accordance with California Government Code Section 65995.

RCM 14-5. Pursuant to the Los Angeles Municipal Code, the Applicant shall pay the applicable Quimby fees for the construction of dwelling units.

Tribal Cultural Resources

RCM 17-1. If suspected Tribal Cultural Resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist and/or tribal monitor from a tribe with cultural ties to the geographic area of the Project site has evaluated the find. Personnel of the proposed Project shall not collect or move any suspected Tribal Cultural Resources and associated materials. Construction activity may continue unimpeded on other portions of the Project site. 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.

Utilities and Service Systems

RCM 18-1. The Project shall implement all applicable mandatory measures within the Los Angeles Green Building Code that would have the effect of reducing the Project's water use. Water demand will be further reduced through incorporation of the following:

- High-efficiency toilets (maximum 1.28 gallons per flush), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gallons per flush), including no-flush or waterless urinals, in all restrooms as appropriate.
- Restroom faucets with a maximum flow rate of 1.5 gallons per minute and self-closing design.
- High-efficiency Energy Star-rated dishwashers, if provided.
- Prohibiting the use of single-pass cooling equipment (single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system).
- Demand (tankless or instantaneous) water heater system sufficient to serve the anticipated needs of the dwellings.
- No more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.
- High-efficiency clothes washers (water factor of 6.0 or less), if provided in either individual units and/or in a common laundry room(s).

RCM 18-2. The Project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season). Water demand will be further reduced through incorporation of the following:

- Weather-based irrigation controller with rain shutoff.
- Matched precipitation (flow) rates for sprinkler heads.
- Drip/microspray/subsurface irrigation where appropriate.
- Minimum irrigation system distribution uniformity of 75 percent.
- Proper hydro-zoning, turf minimization and use of native/drought tolerant plan materials.
- Use of landscape contouring to minimize precipitation runoff.
- A separate water meter (or submeter), flow sensor, and master valve shutoff for irrigated landscape areas totaling 5,000 square feet and greater.

RCM 18-3. In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, the Applicant shall salvage and

recycle construction and demolition materials to ensure that a minimum of 50 percent of construction-related solid waste that can be recycled is diverted from the waste stream to be landfilled. Solid waste diversion would be accomplished though the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 50 percent. In compliance with the Los Angeles Municipal Code, the General Contractor shall utilize solid waste haulers, contractors, and recyclers who have obtained an Assembly Bill (AB) 939 Compliance Permit from the City of Los Angeles Bureau of Sanitation.

RCM 18-4. In compliance with AB341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the proposed Project's regular solid waste disposal program. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341.

I. INTRODUCTION

1. INTRODUCTION

The subject of this Initial Study is the proposed 11460 Gateway Boulevard Project ("Project"), located at the southeast corner of Gateway Boulevard and Exposition Boulevard/Pico Boulevard in the Palms-Mar Vista-Del Rey Community Plan Area of the City of Los Angeles ("City"). The proposed Project consists of the construction of an approximately 88,160-square-foot multi-family residential building containing 129 dwelling units with a 2-level subterranean parking structure. Fifteen of the dwelling units would be set aside as affordable housing for Very Low Income households. Approximately 17,766 square feet of on-site open space is proposed to serve the Project's residents. The Project would provide for 154 parking stalls and 146 bicycle parking spaces. The entire approximately 43,204 square-foot (0.99 acre) Project site is currently developed with commercial land uses including a dry cleaner, restaurant, automotive service facilities, tire store, and associated surface parking lots. Existing on-site uses are proposed to be demolished. The Project is discussed in further detail in Section II of this Initial Study.

2. PROJECT INFORMATION

Project Title: 11460 Gateway Boulevard Project

Project Applicant: 11460 Gateway, LLC
15300 Ventura Boulevard, Suite 405
Sherman Oaks, CA 91403

Project Location: 11460, 11464, 11468, 11470, 11472, 11476, 11480, 11484, 11488 W. Gateway Boulevard; 2426 S. Colby Avenue; 2425 S. Butler Avenue, Los Angeles, CA 90064

Lead Agency: City of Los Angeles Department of City Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

3. PURPOSE AND CONTENTS 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.

State CEQA Guidelines Section 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 plan 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; and

(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; and

(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.

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 implementation of the proposed Project could cause some potentially significant impacts on the environment, but these potentially significant impacts would be reduced to less than significant impacts 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 proposed Project would have significant environmental impacts. Consequently, this Initial Study concludes that a Mitigated Negative Declaration shall be prepared for the proposed Project.

4. ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized as follows:

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

Introduction: This section provides introductory information such as the Project title, the Project Applicant, and the designated 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.

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 Initial Study.

Acronyms & Abbreviations: This section includes a list of acronyms and abbreviations used in the Initial Study.

II. PROJECT DESCRIPTION

1. ENVIRONMENTAL SETTING

A. Project Location

The roughly triangular-shaped, approximately 43,204 square-foot (0.99 acres) site is located at the southeastern corner of the intersection of Gateway Boulevard, Pico Boulevard, and Exposition Boulevard in the Palms-Mar Vista-Del Rey Community Plan Area of the City of Los Angeles (the "City") within Council District 11 (see Figure II-1, Regional and Vicinity Project Location Map). The Project site fronts approximately 270 feet along the easterly side of Gateway Boulevard, 20 feet along the southerly side of Exposition Boulevard/Pico Boulevard, 275 feet along the easterly side of Butler Avenue, and 80 feet along the northerly side of Colby Avenue (see Figure II-2, Aerial View of the Project Site). Table II-1, Project Site Location, lists the street addresses, Assessor's Parcel Numbers (APNs), and present land use associated with the Project site.

Table II-1
Project Site Location

Street Number	Street Name	Assessor Parcel Number	Present Land Use
11460, 11464, 11468, 11470, 11472, 11476, 11480, 11484, 11488	W. Gateway Boulevard	4260-036-043	Commercial
2426	S. Colby Avenue		
2425	S. Butler Avenue	4260-036-042	Ancillary surface parking lot

The commercial land uses at the Project site include a restaurant, automotive service facilities, and a dry cleaner, all of which are currently operational. The ancillary surface parking lot is located in the southeastern corner of the Project site, and serves as parking and vehicle storage for the automotive service uses on the other portion of the site. In addition to the two APNs listed on the above table, the Project site includes public alley right-of-way that generally bisects the site and divides the commercial uses from the ancillary surface parking lot. (The applicant is requesting, through VTT-73891, that the alley be vacated and merged into the Project site as part of the proposed Project.) Views of the Project site are shown on Figure II-3, Views of the Project Site.

Regional access to the Project site is provided by the Santa Monica Freeway (Interstate 10) and the San Diego Freeway (Interstate 405), located approximately 0.16 mile to the south and 0.21 mile to the east, respectively. Direct local access to the Project site is provided by the following roadways: Exposition Boulevard/Pico Boulevard, Gateway Boulevard, Colby Avenue, and Butler Avenue. Secondary local access to the Project site is provided by, but not limited to, the following roadways: Pearl Street, Sawtelle Boulevard, Barrington Avenue, Ocean Park Boulevard, and Olympic Boulevard. Public transit access to the general Project site area is provided by the Big Blue Bus (BBB) operated by the City of Santa Monica. Bus lines with a stop within at least 1,500 feet of the Project site area include the following:

- BBB Route 7 – nearest stop at Pico Boulevard and Gateway Boulevard, approximately 190 feet west of the Project site;
- BBB Route 4 – nearest stop at Pico Boulevard and Sawtelle Boulevard, approximately 1,040 feet east of the Project site;

- BBB Route 17 – nearest stop at Exposition Boulevard and Sawtelle Boulevard, approximately 1,088 feet east of the Project site; and
- BBB Route 5 – nearest stop at Olympic Boulevard and Purdue Avenue, approximately 1,300 feet north of the Project site.

The Metro Rail Expo Line is adjacent to the Project site area, approximately 115 feet to the north, with station stops at Exposition Boulevard and Sepulveda Boulevard (approximately 0.4 mile east of the Project site) and Exposition Boulevard and Bundy Drive (approximately 0.6 mile west of the Project site). The Expo Line provides service between downtown Los Angeles and downtown Santa Monica.

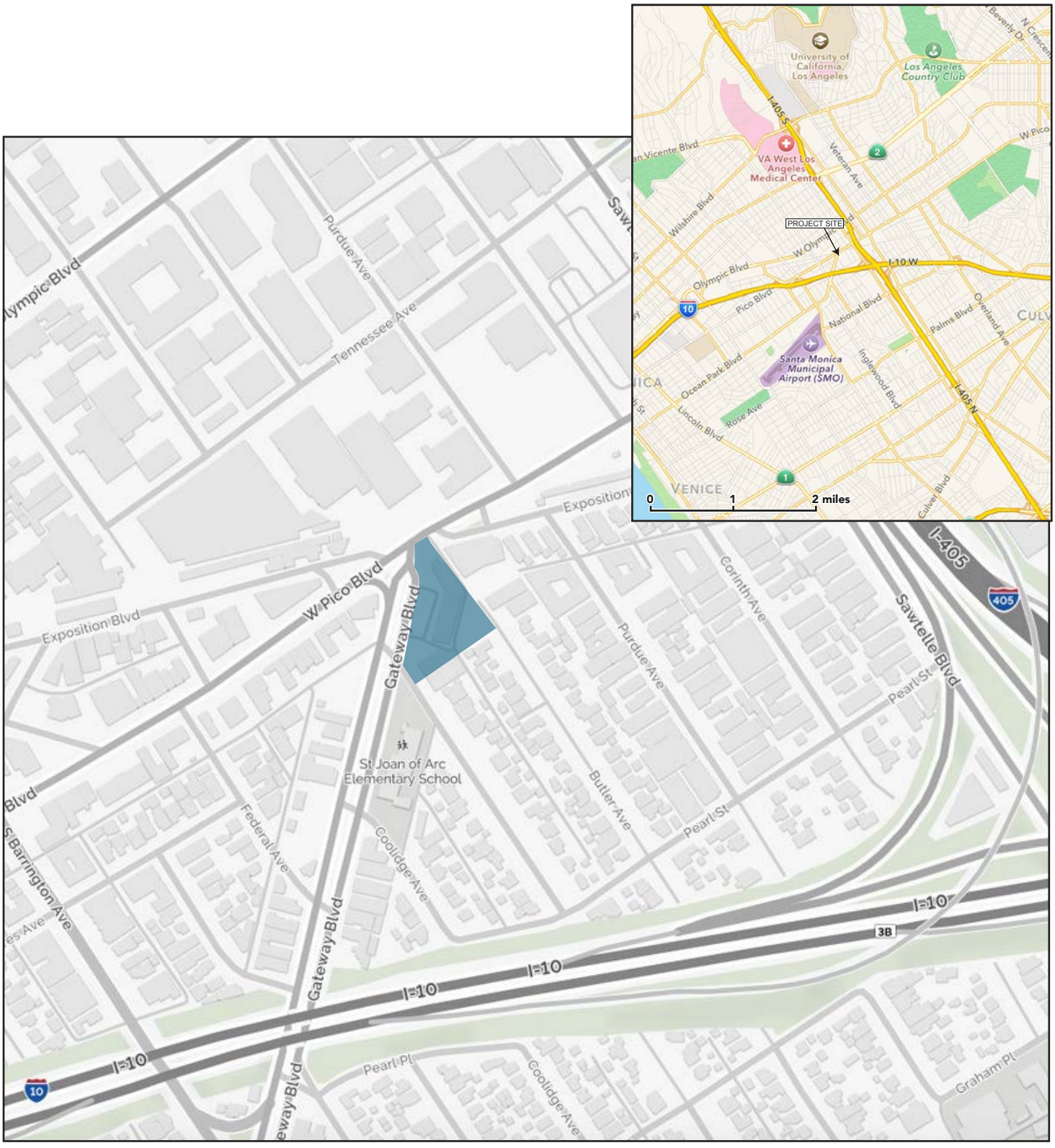
B. Description of Surrounding Area

The Project site is located within an urbanized setting in the West Los Angeles area of the City. The surrounding area is characterized by commercial, residential, and warehouse/storage uses. Land uses that immediately abut the Project site include an adult-oriented commercial use to the north and east, single- and multi-family residential uses to the east, and single- and multi-family residential uses to the south. Beyond the immediately abutting land uses, there are commercial uses to the west; public transit rail line infrastructure (Metro Rail Expo Line), multi-family residential, warehouse/storage uses and the West Los Angeles Animal Shelter to the north; single- and multi-family residential uses to the east, and single-family residential use and an institutional use, St. Joan of Arc Catholic Church, to the south. A public charter school, Citizens of the World – Mar Vista, is located southwest of the Project site. Views of the surrounding land uses are shown on Figures II-4 and II-5, Views of the Surrounding Land Uses.

Within the Project site area, Gateway Boulevard is classified as Boulevard II, Pico Boulevard is classified as Avenue I, and Exposition Boulevard, Colby Avenue, and Butler Avenue are classified as Local Street – Standard. Furthermore, Table II-2, Open Space Areas, lists the nearest open space areas within a two-mile radius.

Table II-2
Open Space Areas

Open Space Area	Location	Distance from Project Site
Stone Recreation Center	1835 Stoner Avenue, City of Los Angeles	0.8 mile northwest
Santa Monica Airport Park	3201 Airport Avenue, City of Santa Monica	1.1 miles southwest
Venice Reservoir Site	East of Rose Avenue and Centinela Avenue intersection, City of Los Angeles	1.2 miles south
Mar Vista Recreation Center	11430 Woodbine Avenue, City of Los Angeles	1.3 miles southeast
Palms Recreation Center	2950 Overland Avenue, City of Los Angeles	1.3 miles east
Clover Park	2600 Ocean Park Boulevard, City of Santa Monica	1.4 miles southwest
Westwood Recreation Center/Aidan's Place Park	1350 Sepulveda Boulevard, City of Los Angeles	1.5 miles north
Virginia Avenue Park	2200 Virginia Avenue, City of Santa Monica	1.6 miles southwest
Woodbine Park	3409 Vinton Avenue, City of Los Angeles	1.9 miles southeast
Penmar Recreation Center	1341 Lake Street, City of Los Angeles	2.0 miles southwest



Project Site

Source: Mapquest, November 2015.

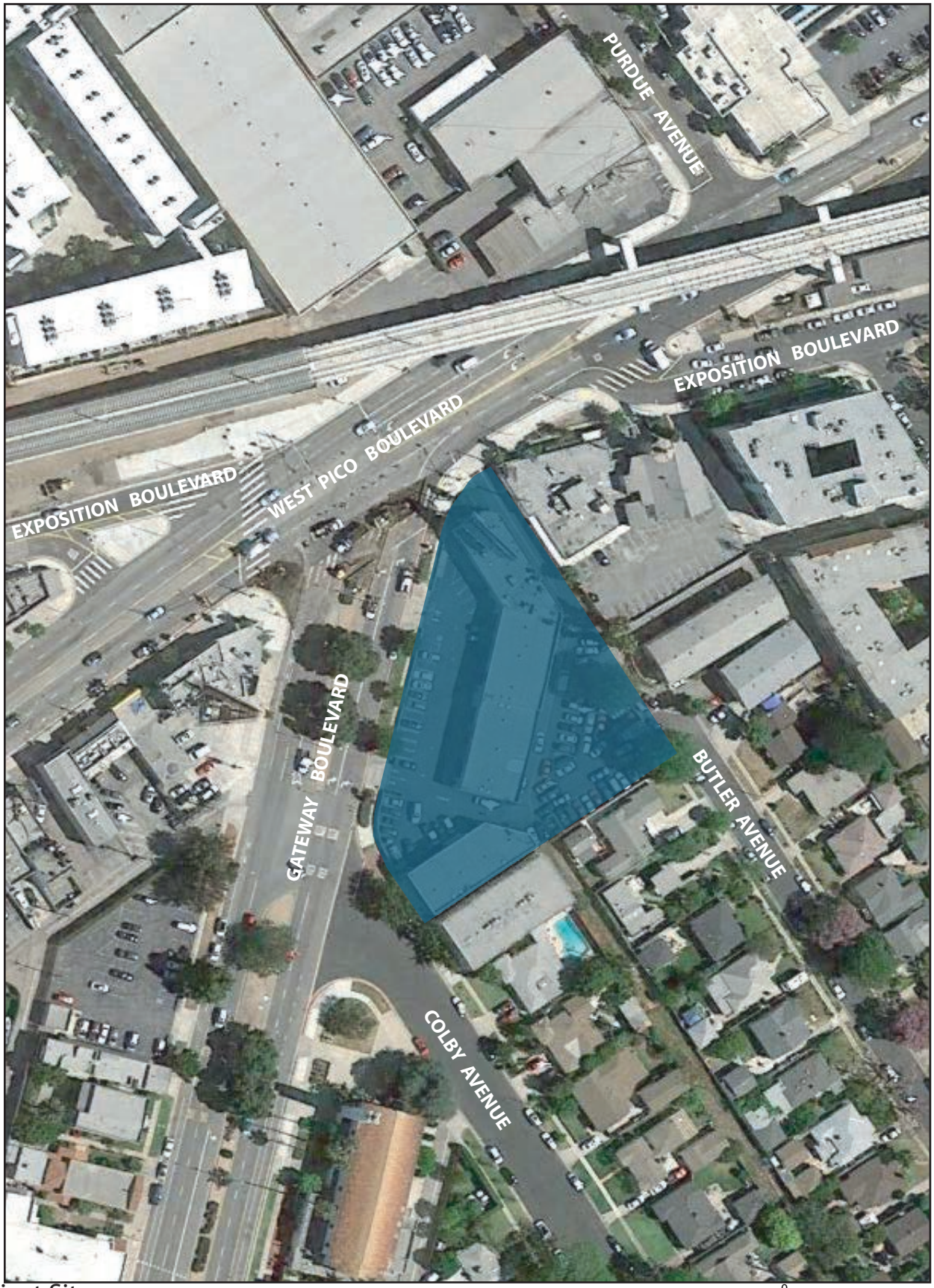
0 300

Scale (Feet)

N

EcoTierra consulting

Figure II-1
Regional and Vicinity Project Location Map



Project Site

Source: Google Earth, December 2015.

0 152

Scale (Feet)

N

EcoTierra consulting

Figure II-2
Aerial View of the Project Site

PROJECT SITE

PHOTO LOCATION MAP

View 1: View looking southeast at the northern portion of the Project site from Gateway Boulevard and Exposition Boulevard/Pico

View 2: View looking east at the southern portion of the Project site from Gateway Boulevard and Colby

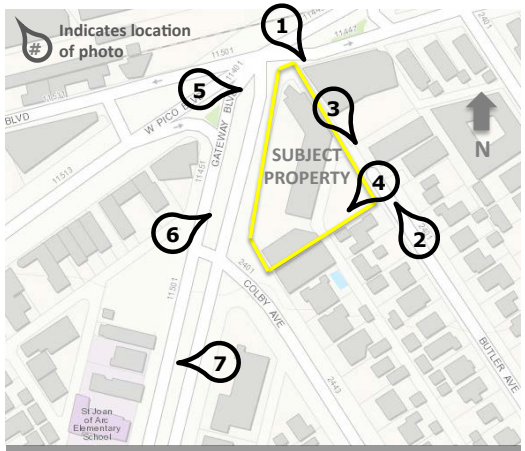
View 3: View looking southwest at the on-site public alley right-of-way toward southeastern portion of the Project site.

View 4: View looking west from on-site ancillary surface parking lot toward southwestern portion of the Project site.

Source: EcoTierra Consulting, December 2015.

EcoTierra consulting

Figure II-3
Views of Project Site



Map 1 – Key Map I

Map 2 – Aerial view of subject property and environs


Figure 1 – View of Subject Property along Butler Ave, facing southeast


Figure 2 – View along Butler Ave between the Project site and adjacent single family neighborhood, looking northwest


Figure 3 – View of the Butler Ave gate between the Project site and the adjacent single family neighborhood, looking southeast

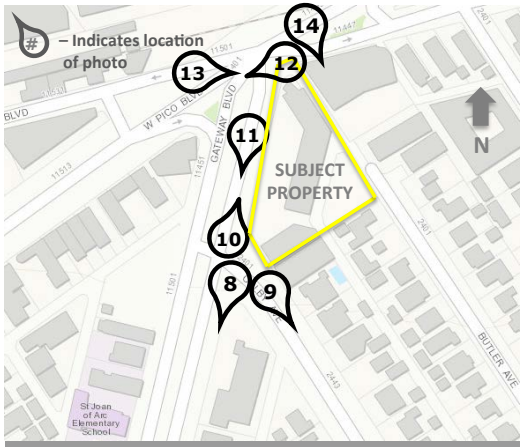

Figure 4 – View of the rear portion of the subject Property looking south


Figure 5 – View of Subject Property across Gateway Blvd, facing east


Figure 6 – View of subject Property across Gateway Blvd, facing northeast


Figure 7 – View of adjacent use St. Joan of Arc School across Gateway Blvd, looking west

Source: three6ixty, December 2015.



Map 3 – Key Map II

Map 2 – Aerial view of subject property and environs


Figure 8 – View of St. Joan of Arc Church across Colby Ave, facing south


Figure 9 – View of adjacent single-family properties along Colby Ave, facing southeast


Figure 10 – View of Project site and planted sidewalk along Gateway Blvd, looking north


Figure 11 – View of Project site and adjacent St. Joan of Arc Church tower,, looking south


Figure 12 – View of the intersection of Pico Blvd, Gateway Blvd, and Exposition Blvd adjacent to the Property looking west.


Figure 13 – View of Project site and Expo Line from the intersection of Gateway Blvd and Exposition Blvd, looking east


Figure 14 – View of adjacent adult entertainment property and Project site across Pico Blvd, looking south

Source: three6ixty, December 2015.

C. Existing Site Zoning and Land Use Designations

The Project site is located within the Palms-Mar Vista-Del Rey Community Plan Area, which designates the Project site (both APNs) for General Commercial land uses. The two APNs where the Project site is located each consist of different zoning categories per the City's Planning and Zoning Code. APN 4260-036-043, which includes the commercial lots fronting Gateway Boulevard, Exposition Boulevard/Pico Boulevard, and Colby Avenue, is zoned [Q]C2-1VL-CDO (Commercial use [Qualified] – Very Limited Height District No. 1VL – Community Design Overlay District). Both the "Q" qualified conditions and the Community Design Overlay District (CDO) refers to the C2-zoned portion of the Project site which is located within the West Pico Boulevard CDO. This CDO provides guidelines and standards for development projects on commercially and industrially designated properties between the San Diego Freeway (Interstate 405) on the east, Tennessee Avenue to Federal Avenue on the north, Pico Boulevard to the south, and the City boundary at Centinela Avenue on the west. The intent of the West Pico Boulevard CDO is to provide guidance and direction in the design of buildings including storefronts that will enhance the appearance of the area. APN 4260-036-042, which includes the parcel along Butler Avenue frontage, is zoned R3-1 (Multiple Family Residential – Height District No. 1). This parcel is currently paved and serves as parking and vehicle storage for the automotive service uses on the other portion of the site, and currently does not include residential land uses. Furthermore, the Project site is within the West Los Angeles Transportation Improvement and Mitigation Specific Plan Area.

The commercially-zoned portion of the Project site (APN 4260-036-043) permits multi-family residential uses at the R4 zoning density (1 dwelling unit per 400 square feet of lot area) with a maximum building height of 45 feet, 3 stories (unless entirely residential), and a 1.5:1 floor area ratio (FAR).[1] The residentially-zoned portion of the Project site (APN 4260-036-042) permits multi-family residential uses at the R3 zoning density (1 dwelling unit per 800 square feet of lot area) with a maximum building height of 45 feet, unlimited stories, and a 3:1 FAR.[2] However, as further discussed below (see "Affordable Housing and Density Bonus"), California Government Code Section 65915 and the City of Los Angeles Municipal Code (LAMC) Section 12.22-A,25 permit a density bonus and development incentives for projects that include affordable housing. Pursuant to the State density bonus law and LAMC, the Project is requesting "on-menu" incentives which are required to develop the development at the site in exchange for reserving 15 percent of the base density (or 15 residential units) for Very Low Income households.

2. PROJECT CHARACTERISTICS

A. Project Features

The Project involves the demolition of the existing commercial land uses and on-site surface parking lot areas, and the construction of a multi-family residential building containing 129 dwelling units. The Project would be subdivided for residential condominiums; however, units may be rented as apartments initially. The proposed approximately 88,160 square-foot building would be 5 stories and a maximum of 56 feet tall. Parking would be provided in a two-level subterranean parking structure. A total of 154 vehicle parking stalls and 146 bicycle parking spaces would be provided on site to serve the Project. Table II-3, Project Development Summary, provides a summary of the Project. The proposed Project's plans are shown on Figures II-6 through II-20.

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[1] *Per LAMC Section 12.21.1.*

[2] *Ibid.*

Table II-3
Project Development Summary

Land Use	Quantity
Residential Units	
Studio	63
1-Bedroom	60
2-Bedroom	6
Total Units	**129**
Parking Spaces	
Total Vehicle Parking Stalls	**154**
Long-Term Bicycle Parking Spaces	132
Short-Term Bicycle Parking Spaces	14
Total Bicycle Parking Spaces	**146**
Open Space (sf)	
Common Open Space	12,691
Amenity Space	1,325
Private Decks	3,800
Total Open Space (sf)	**17,766**
sf = square feet	
Source: DFH Architects, September 2016.	

Of the proposed 129 dwelling units, 125 dwelling units would be generally concentrated along the street frontages of Butler Avenue, Gateway Boulevard, and Colby Avenue within the commercial C2-zoned portion of the Project site, and four 2-bedroom, 2-story townhome-type units would be located near the rear of the Project site within the residential R3-zoned portion of the site. Ground-floor units along Gateway Boulevard are designed as "live/work" units with stoops and direct entryways from the street. Moreover, 15 of the 129 residential units would be reserved as deed-restricted affordable housing for Very Low Income households. Private decks are proposed for most of the residential units and vary in size.

Vehicle access to the Project would be available from a driveway on Butler Avenue from which the two-level subterranean parking structure would be accessed. Long-term bicycle parking would be provided at-grade. As is further discussed below (see "Affordable Housing and Density Bonus"), the Project is entitled to a density bonus parking reduction as set forth in the City's density bonus ordinance. Assembly Bill 744 permits parking at a ratio of 0.5 parking spaces per bedroom for mixed-income projects within a half-mile of a major transit stop (Sepulveda Boulevard and Exposition Boulevard, and Sepulveda Boulevard and Pico Boulevard). Thus, as the Project would include a total of 123 studio and 1-bedroom units and 6 2-bedroom units, 68 parking stalls are required on site; however, the Project would provide 154 parking stalls. The Project's long-term bicycle parking spaces accessed from the ground-floor and short-term bicycle parking spaces would be located along Gateway Boulevard. Moreover, the Project's 146 bicycle parking spaces (132 long-term and 14 short-term) exceed the minimum requirements for bicycle parking spaces on site as set forth in LAMC Section 12.21-A,16, which requires a minimum of 142 bicycle parking spaces (129 long-term and 13 short-term) based on the size of the Project.[3]

[3] *Long-term bicycle parking ratio 1 per dwelling unit (129 x 1 = 129) and short-term bicycle parking ratio 1 per 10 dwelling units (129 / 10 = 12.9).*

The distribution of open space throughout the Project at various orientations, scales, and levels is intended to create opportunities for a wider variety of activities and allow each space to be shared by a smaller group of residents for community engagement and interaction. The ground floor of the Project would include a gym and central courtyard including a barbeque with counter, outdoor dining, benches and landscaping. The rooftop would include a barbeque and bar, fire pit, and dining area near the northern portion of the site at the intersection of Gateway Boulevard and Pico Boulevard, and barbeque and bar, lounge area, outdoor television, and community garden near the southwestern portion of the site at the intersection of Gateway Boulevard and Colby Avenue.

The proposed building would meet and/or exceed all City Building Code and Title 24 requirements. As such, the building would incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star®-rated appliances, water saving/low-flow fixtures, non-volatile organic compound paints/adhesives, drought-tolerant planting, and high performance building envelopment. As also required by the City Building Code, the proposed building would accommodate rooftop solar photovoltaic panels and on-site electric vehicle chargers, which would be provided in the parking structure.

B. Affordable Housing and Density Bonus

Considering the allowable density per the City's Planning and Zoning Code and Assembly Bill 2501, the Project utilizes a base density of 84 residential dwelling units in the commercially-zoned portion of the site (APN 4260-036-043) and 13 residential dwelling units in the residentially-zoned portion of the site (APN 4260-036-042). Under the existing zoning for the Project site, the Project may develop 97 residential dwelling units.[4] The Project includes 15 dwelling units reserved for Very Low Income households, which represents approximately 15 percent of the base density, and therefore, the Project qualifies for a 35 percent density bonus and 3 on-menu incentives as set forth in the City's density bonus ordinance (LAMC Section 12.22-A,25). Utilizing this 35 percent density bonus, the Project would be permitted to build 34 additional residential dwelling units at the Project site for a total of 131 dwelling units; however, the Project proposes to construct a total of 129 residential dwelling units with the aforementioned 15 units reserved for Very Low Income households and the remaining 114 units at market rate.

The Project is requesting the following on-menu housing incentives:

- FAR increase of 35 percent to a maximum of 2.02:1 on the [Q]C2-1VL-CDO zoned portion of the site and 4.05:1 in the R3-1 zoned portion for an average of 2.24:1 FAR across the site;
- Increase building height 11 feet for a maximum height of 56 feet; and
- Permit the averaging of FAR, density, parking, and open space and to permit vehicular access from a less restrictive zone to a more restrictive zone.

Consistent with the City's density bonus ordinance, the Project is entitled to a density bonus parking reduction, which requires 0.5 on-site parking stalls for each bedroom as per Assembly Bill 744 for mixed-income projects within a half-mile of a major transit stop (Sepulveda Boulevard and Exposition Boulevard,

[4] *Commercially-zoned portion of the Project site is 33,503 square feet, which at 1 dwelling unit per 400 square feet, equals 84 residential dwelling units (33,503 / 400 = 83.76). (It should be noted that when base density is calculated, numbers are rounded up to nearest whole number pursuant to Assembly Bill 2501.) Residentially-zoned portion of the Project site is 9,701 square feet, which at 1 dwelling unit per 800 square feet, equals 13 residential dwelling units (9,701 / 800 = 12.13). The Project utilizes a base density of 97 units.*

and Sepulveda Boulevard and Pico Boulevard). As discussed above, the Project would exceed the minimum on-site parking requirements of this parking option.

Table II-4, Project Site Base Zoning and Density Bonus Statistics, compares what is required/permitted under existing zoning at the Project site to the proposed Project utilizing the residential and parking density bonuses and above-identified incentives. Moreover, the Project complies with all applicable provisions of LAMC Section 12.22-A,25 (as codified in Ordinance No. 179,681).

Table II-4
Project Site Zoning and Density Bonus Statistics

	Required/Permitted (Base Zoning)		Proposed Project (Inc. Density Bonus and Incentives)
	C2-1VL-CDO	R3-1	
Project Site Area	43,204 sf		
Area by Zone	33,503 sf	9,701 sf	--
Total Units (Area/Density)	(1 du/400 sf)	(1 du/800 sf)	
Base	84	13	97
Including 35% Density Bonus	114	18	129[a]
Studio			63
1-Bedroom			60
2-Bedroom			6
Allowable Buildable Area	92,142 sf[b]		88,160 sf
FAR	1.5:1 / 2.05:1[c]	3.0:1 / 4.05:1[c]	2.24:1[c]
Parking (Residential)	68		154
Front Yard Setback	0 ft	0 ft	0 ft
Side Yard Setback	8 ft	8 ft	8 ft
Rear Yard Setback	N/A	N/A	N/A
Open Space	13,050 sf		17,766 sf
Building Height	45 ft	45 ft	56 ft[d]
Allowable Stories	Unlimited (residential only)	Unlimited	5

sf = square feet; du = dwelling unit; ft = feet

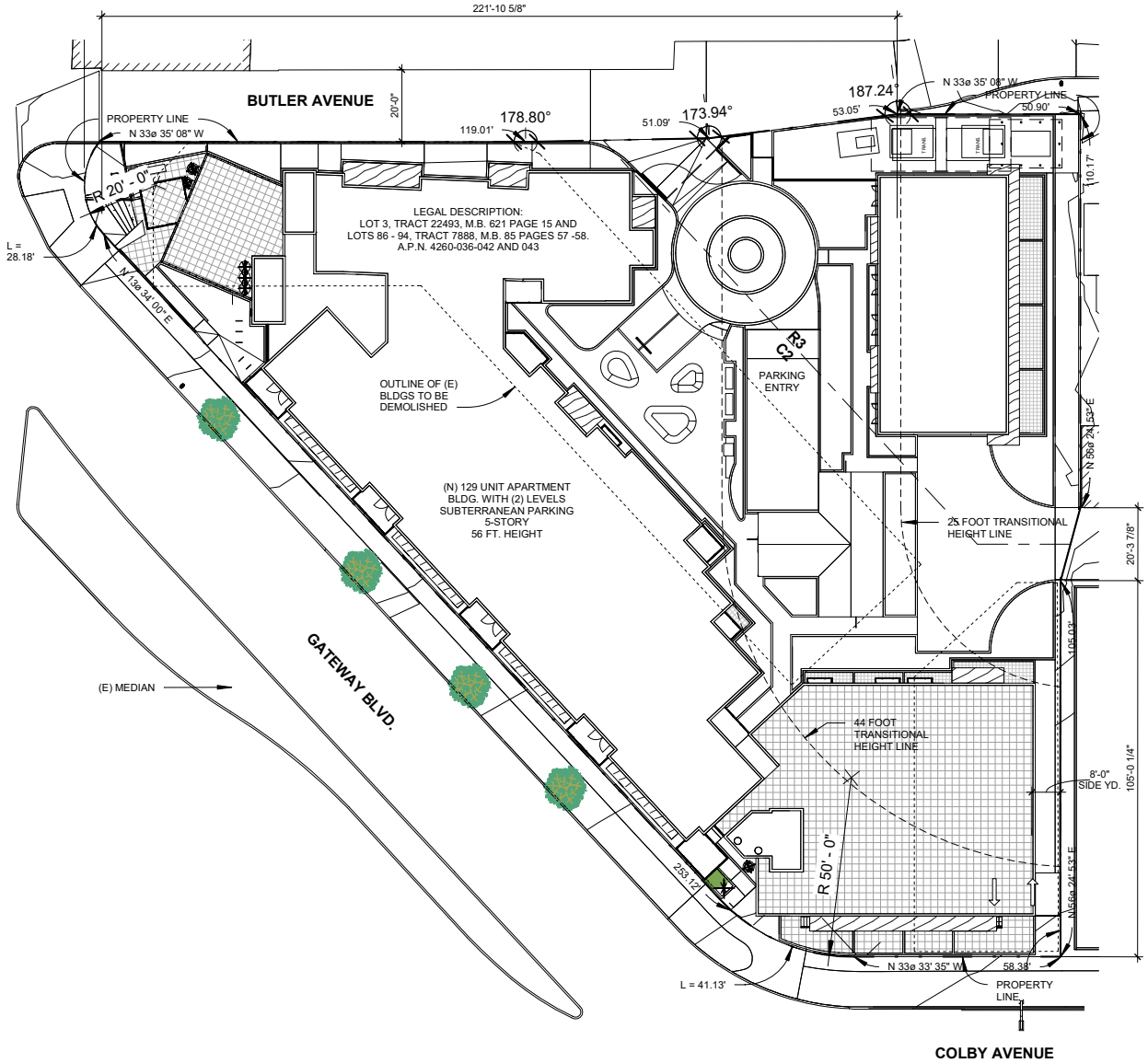
[a] *A total of 131 units are permitting after utilizing 35% density bonus pursuant to LAMC Section 12.22.A.25; however, the Project proposes 129 units*

[b] *Buildable area is calculated by deducting the setback area and dedications (with side yard reduction) from the total lot area*

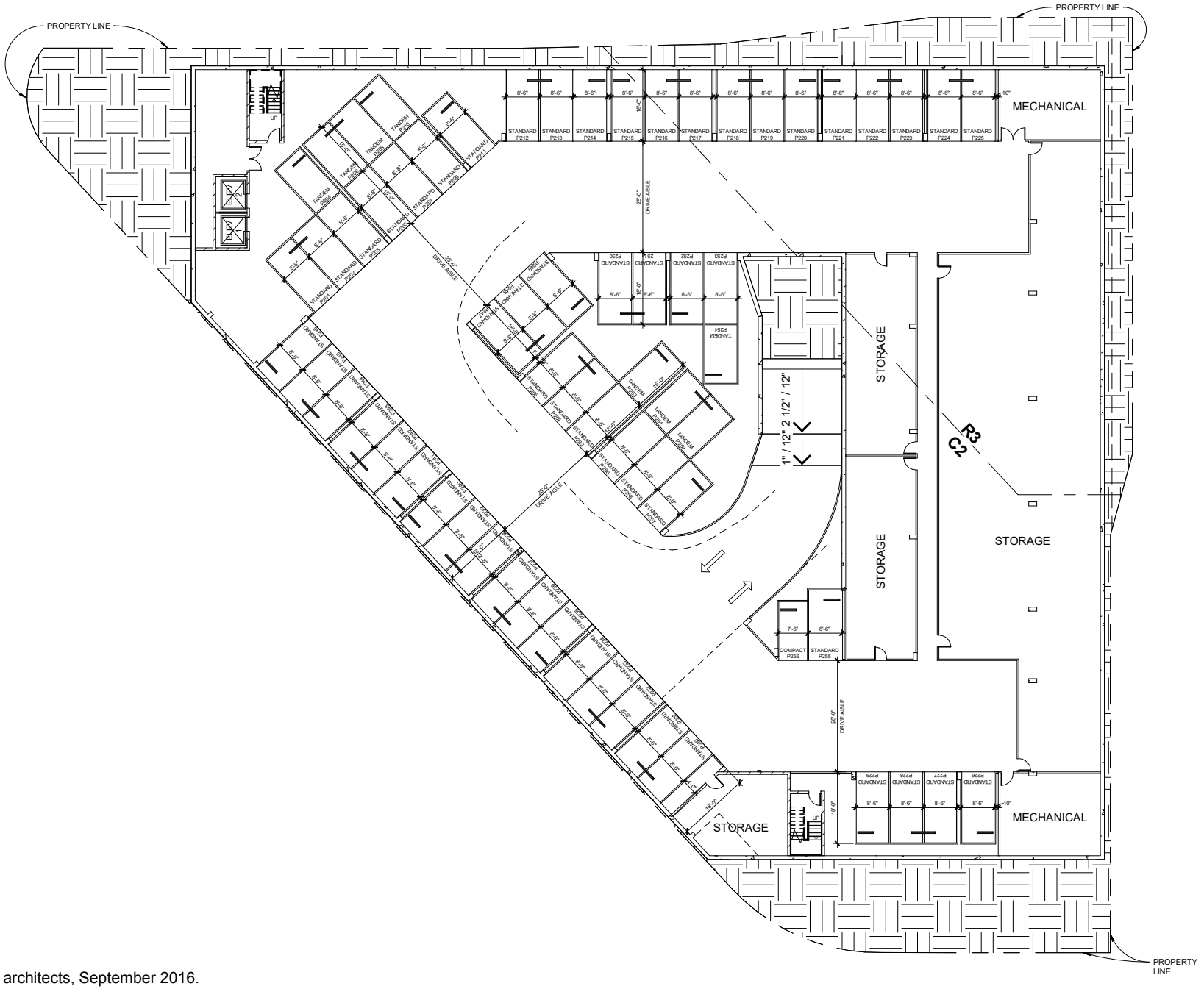
[c] *Utilizing on-menu incentive permitting a FAR increase of 35 percent*

[d] *Utilizing an off-menu incentive for 11 additional feet*

Source: Three6ixty, September 2016.



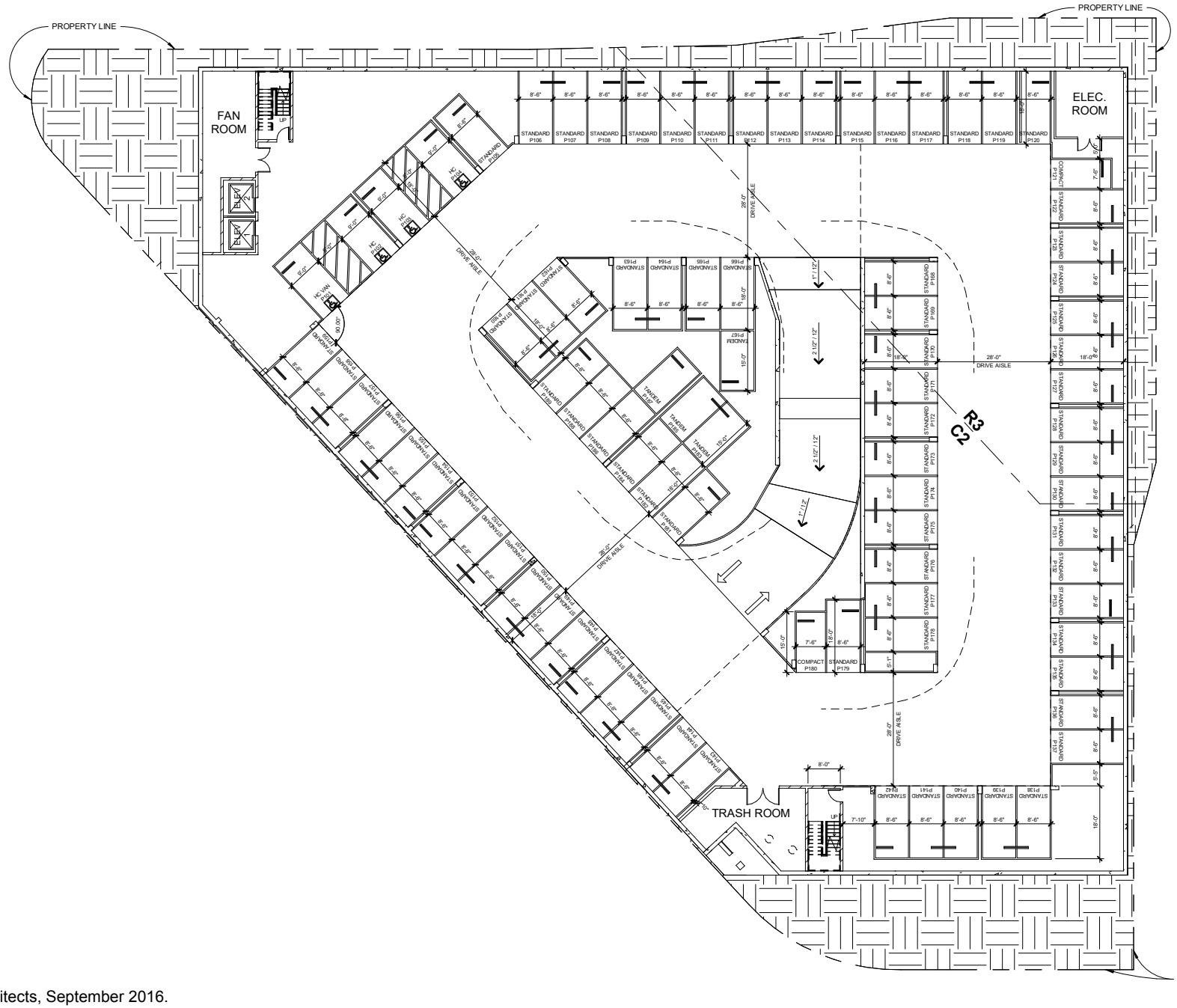
Source: dfh architects, September 2016.



Source: dfh architects, September 2016.

EcoTierra consulting

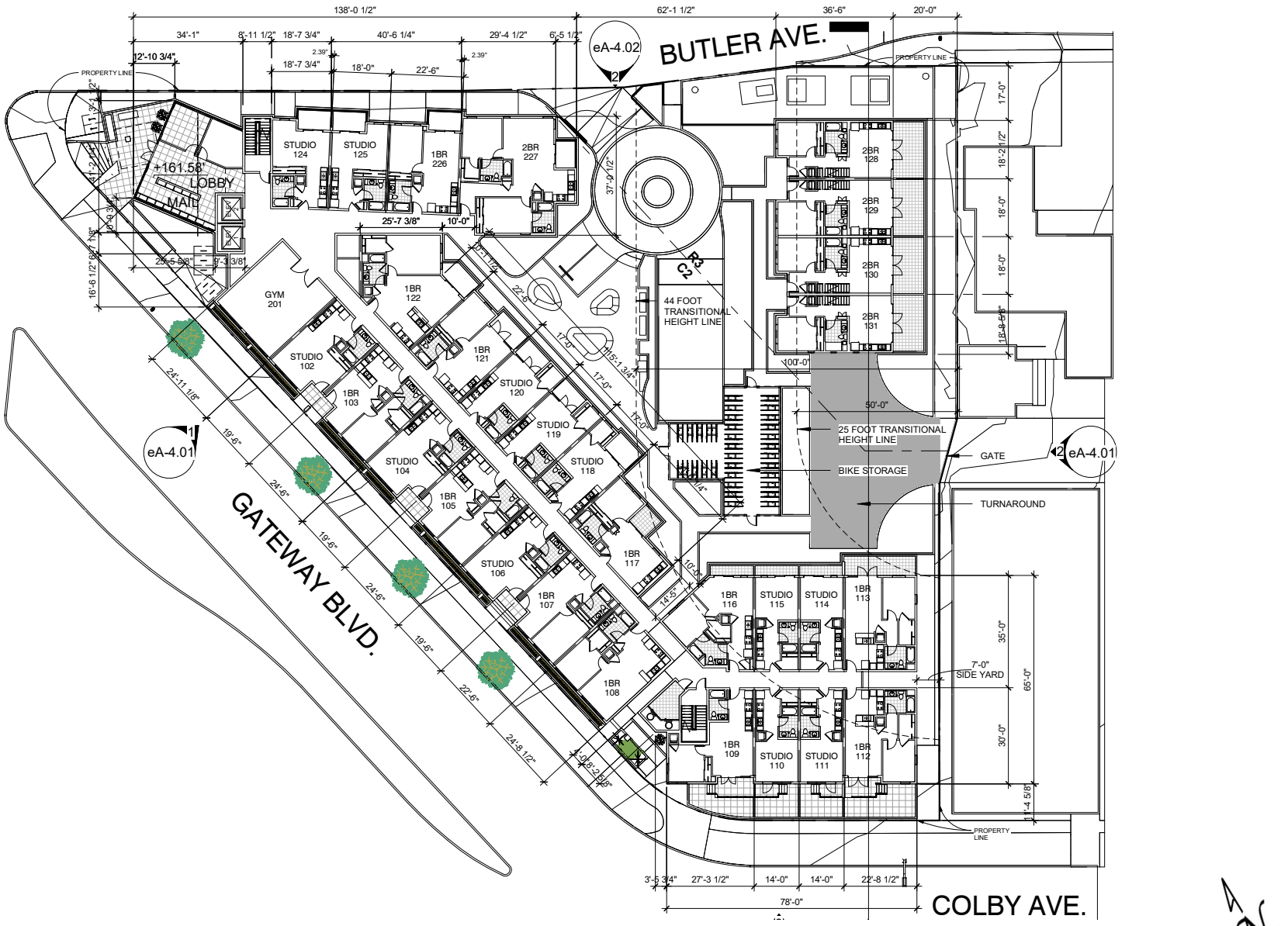
Figure II-7
Subterranean Parking Level 2



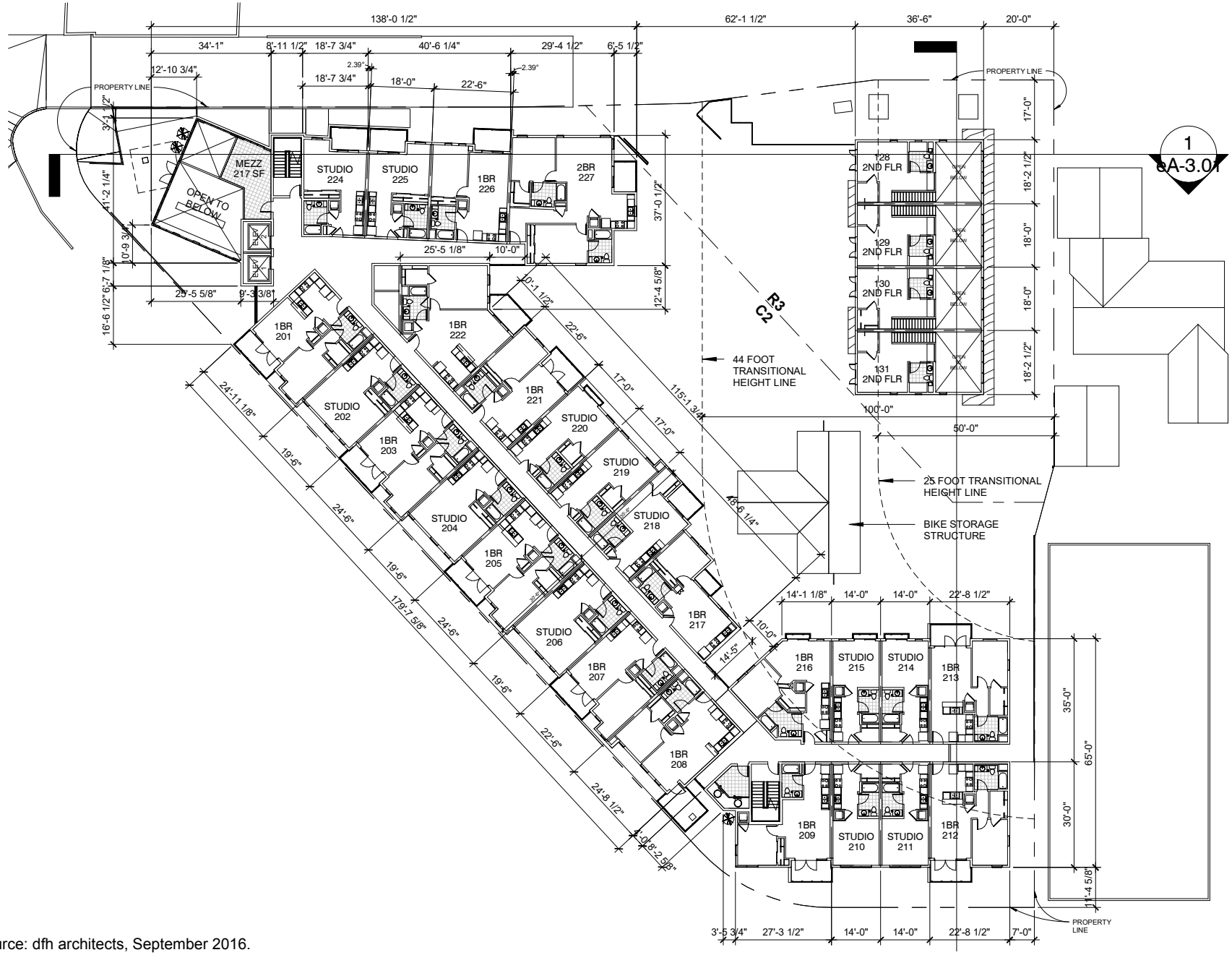
Source: dfh architects, September 2016.

EcoTierra consulting

Figure II-8
Subterranean Parking Level 1



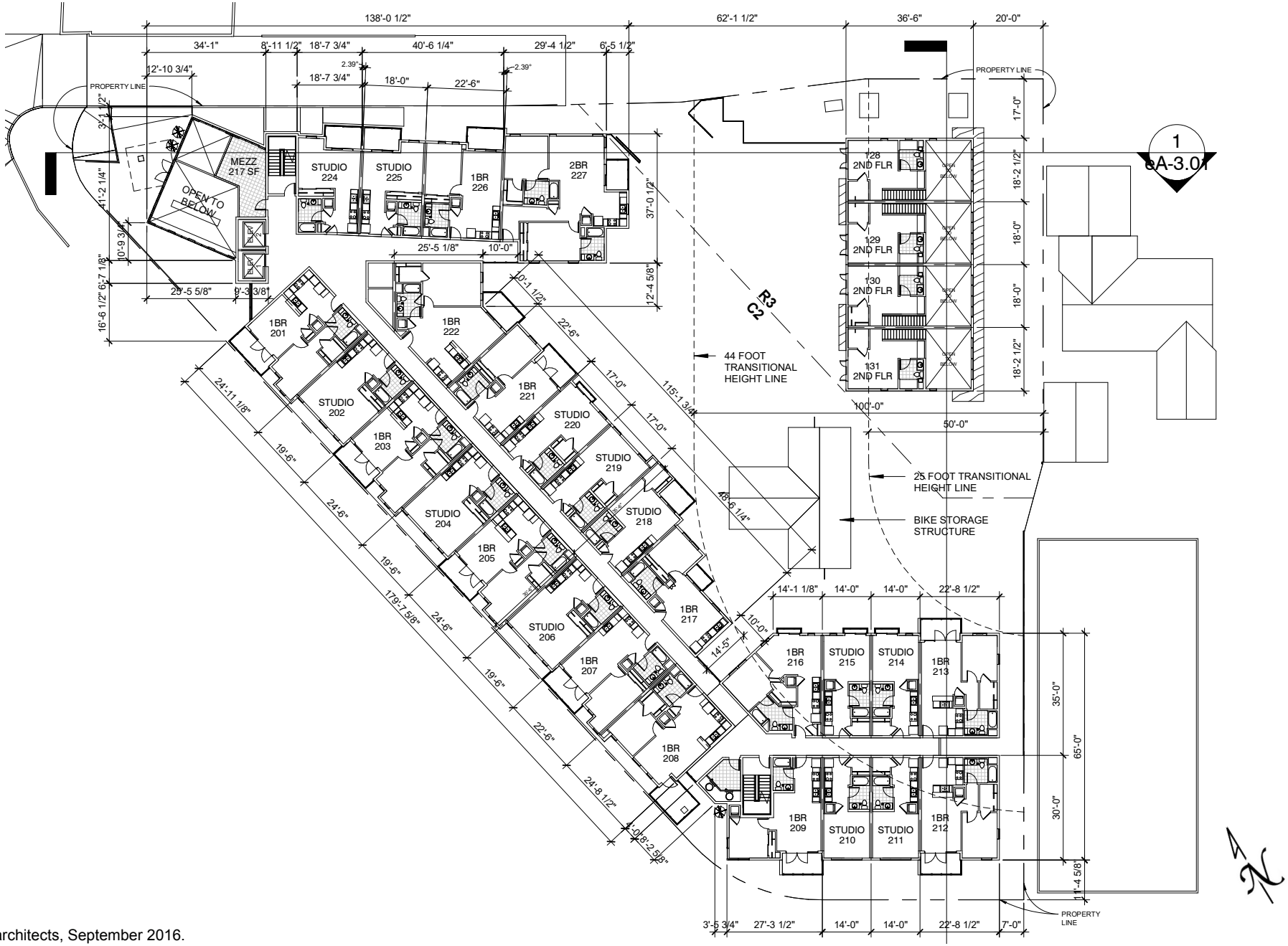
Source: dfh architects, September 2016.



Source: dfh architects, September 2016.

EcoTierra consulting

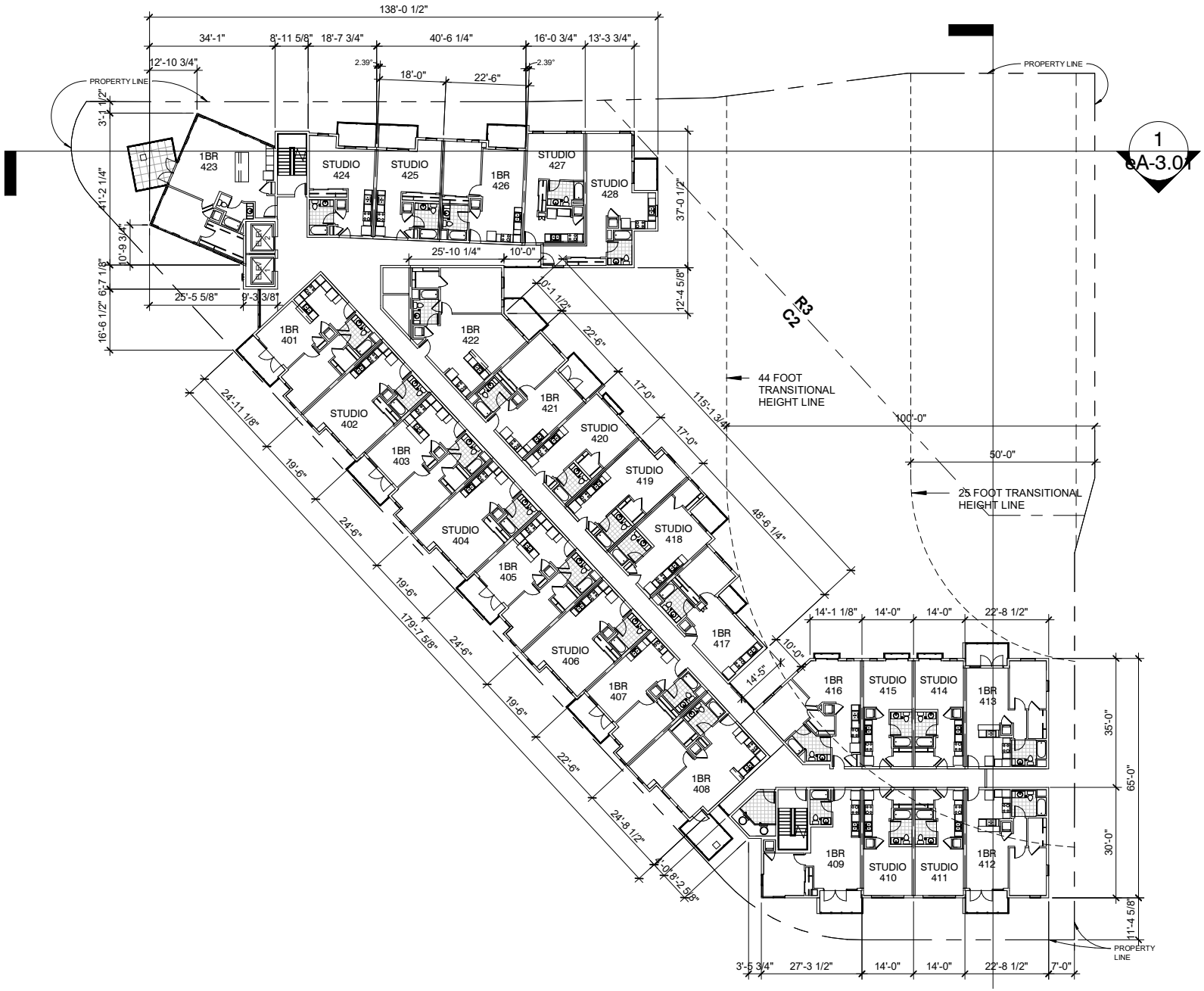
Figure II-10
Second Floor Building Plan



Source: dfh architects, September 2016.

EcoTierra consulting

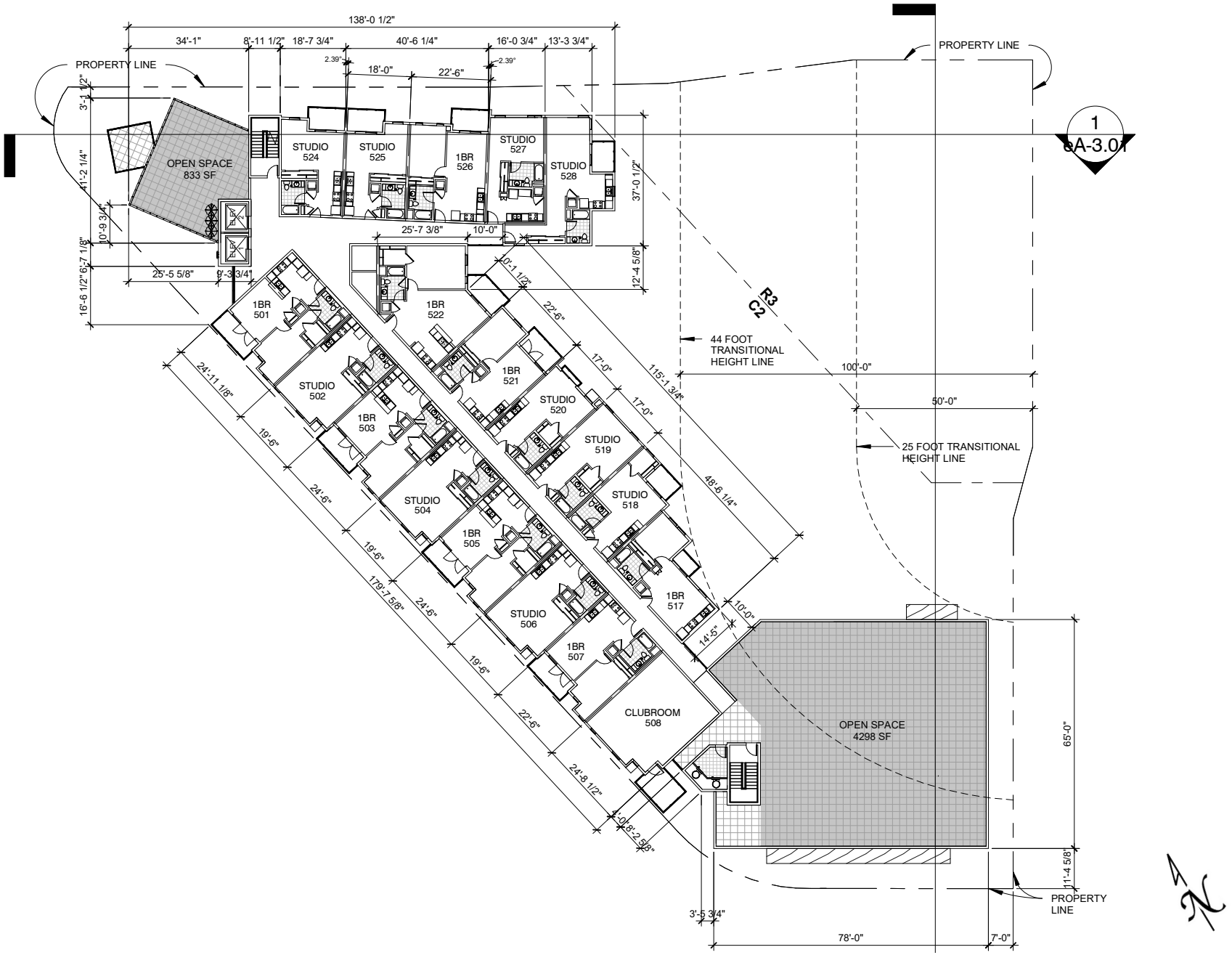
Figure II-11
Third Floor Building Plan



Source: dfh architects, Septmeber 2016.

EcoTierra consulting

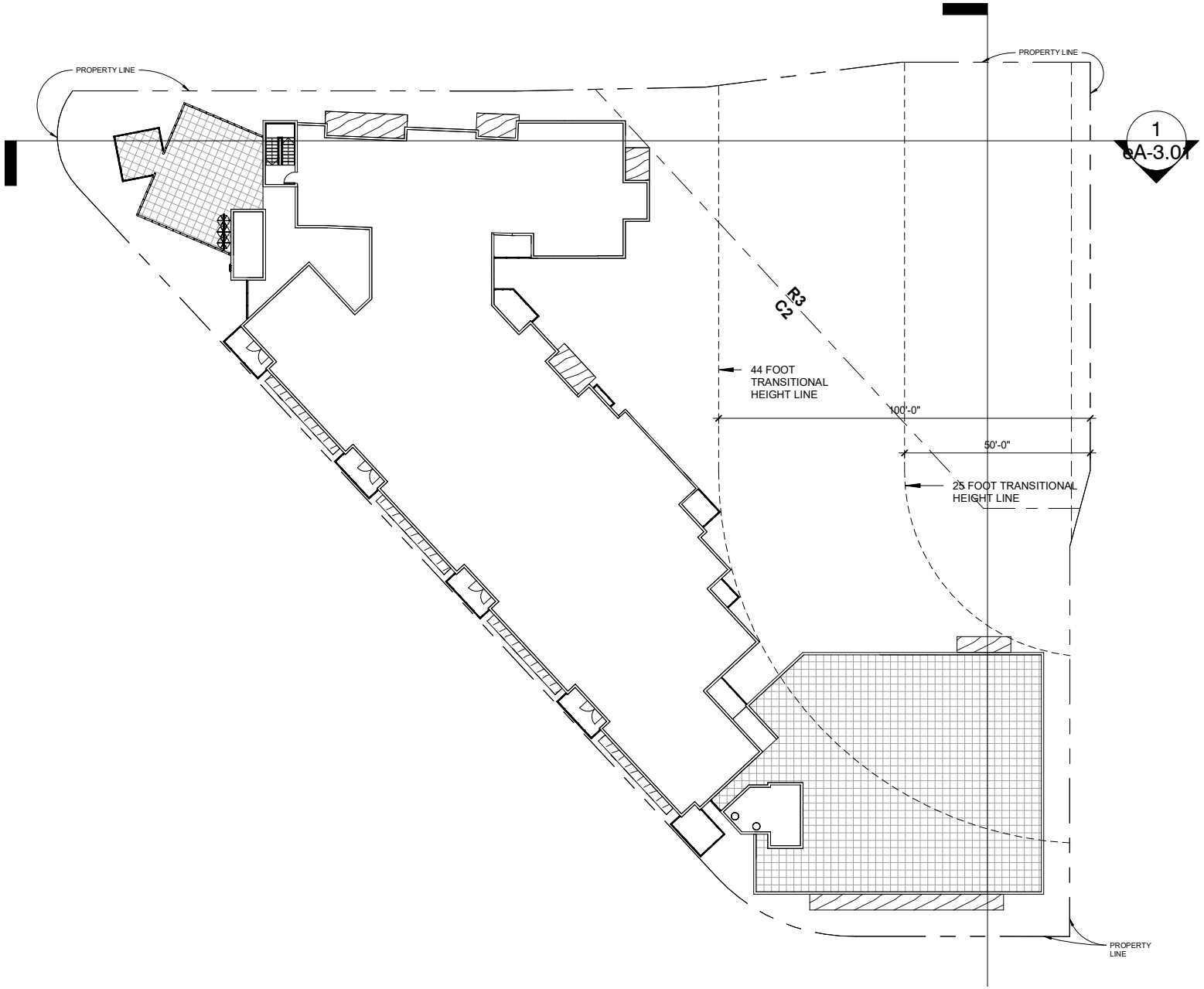
Figure II-12
Fourth Floor Building Plan



Source: dfh architects, September 2016.

EcoTierra consulting

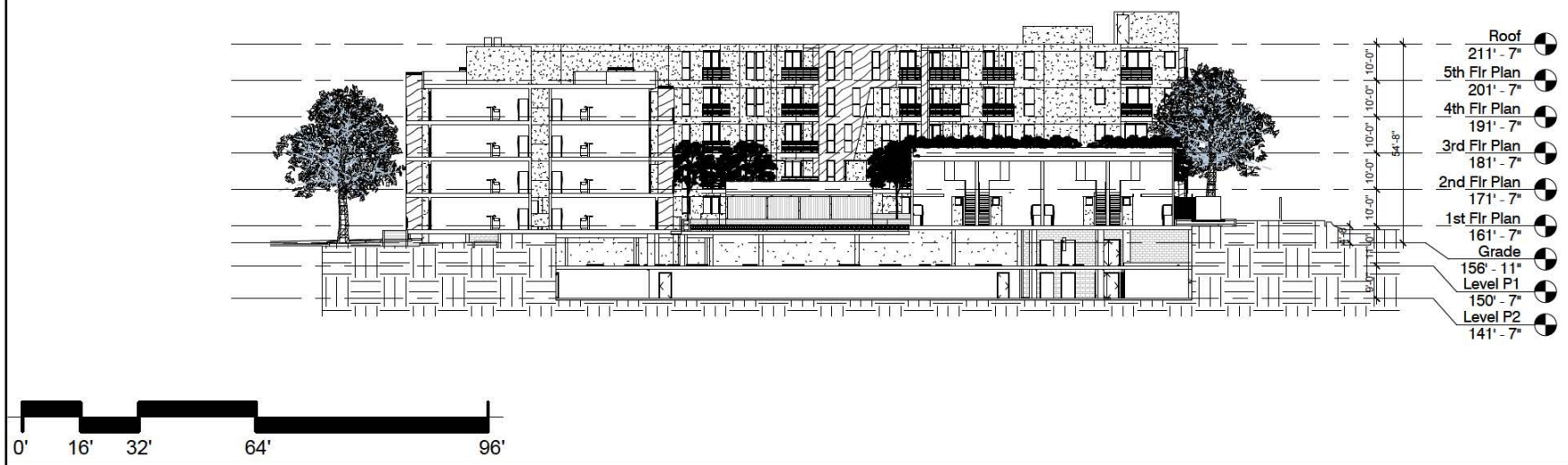
Figure II-13
Fifth Floor Building Plan



Source: dfh architects, September 2016.

EcoTierra consulting

Figure II-14
Building Roof Plan



BLDG. SECTION B

SCALE: 1/32" = 1'-0"

2

BLDG. SECTION A

SCALE: 1/32" = 1'-0"

1

Source: dfh architects, October 2015.

Source: dfh architects, September 2016.

EcoTierra consulting

Figure II-16
Conceptual Elevations – Rear and Gateway Boulevard

e Butler Elevation | SCALE: 1/32" = 1'-0" | 2

e Colby Elevation | SCALE: 1/32" = 1'-0" | 3

Source: dfh architects, September 2016.

EcoTierra consulting

Figure II-17
Conceptual Elevations – Butler Avenue and Colby Avenue

Keynote:

1. Community Entrance
2. Remote Gate
3. Succulent Planting On Structure

4. Parking Garage Ramp
5. Interlocking Herringbone Drive Pavers

6. Drop off Location
7. Strada Web Planting Mound

8. Benches

9. BBQ With Counter
10. Outdoor Dinning
11. Over head Shade Structure
12. ADA Ramp
13. Bike Parking

14. Grass pave System

15. Lit Glass Address Sign

16. Planting Pot
17. Garage level Line
18. Compact Parking Stall

Planting Legend

Cupaniopsis Anacardioides
Carrotwood

Olea Europaea
Fruitless Olive Tree

Gleditsia Triacanthos
Honey Locust

Cercis Occidentalis
Western Redbud

Cercidium Hybrid
Palo Verde Desert Museum

Liriodendoron Tulipifera
Tulip Tree

Protected Existing Trees
California Sycamore

Source: dfh architects, September 2016.

EcoTierra consulting

Figure II-18
First Floor Preliminary Landscape Plan

Source: dfh architects, September 2016.

EcoTierra consulting

Figure II-19
Roof Level Preliminary Landscape Plan

Source: dfh architects, September 2016.

EcoTierra consulting

Figure II-20
Conceptual Rendering from Gateway Boulevard

C. Construction

The Project would be constructed over approximately 20 months, starting in early 2018. Construction activities would include demolition, grading, excavation, and building construction. Demolition, grading, excavation, and site preparation activities would occur over approximately 4 months, and building construction would occur over approximately 16 months. The Project would be ready for occupancy in early 2020.

The Project would require the export of approximately 34,500 cubic yards of soil from the Project site. No soil would be imported. Approximately 14,594 square feet of existing commercial uses would be demolished by the Project, as well as the surface parking lot areas, most of which would be recycled.

The likely haul route would be either 1) Gateway Boulevard north to Exposition Boulevard/Pico Boulevard, east on Exposition Boulevard to Sawtelle Boulevard, south on Sawtelle Boulevard to National Boulevard, then east on National Boulevard to the San Diego Freeway (Interstate 405); or 2) Gateway Boulevard north to Exposition Boulevard/Pico Boulevard, east on Exposition Boulevard to Sawtelle Boulevard, south on Sawtelle Boulevard to National Boulevard, east on National Boulevard to Overland Avenue, then south on Overland Avenue to the Santa Monica Freeway (Interstate 10). Exported materials would be disposed at the Puente Hills landfill in the City of Whittier (soil only), Bradley Landfill and Recycling Center in Sun Valley, and/or at the Atkinson Brickyard site in the City of Compton.

3. DISCRETIONARY ACTIONS AND APPROVALS

The Department of City Planning is the Lead Agency for the Project. In order to permit development of the Project, the City may require approval of one or more of the following discretionary actions:

- Vesting Tentative Tract Map No. 73891, pursuant to LAMC Section 17.06, to create a one-lot subdivision, including the merger and vacation of public alley right-of-way to create 129 residential condominiums and a determination of yards by the Advisory Agency to allow Gateway Boulevard and Colby Avenue as Front Yard and all other yards as Side Yards pursuant to LAMC Section 17.03-A;

- Density bonus including on-menu incentives required for the construction, use, and maintenance of a 5-story, multi-family residential building providing 129 residential units with two levels of subterranean parking:

    - On-Menu Incentives:

        - Pursuant to LAMC Section 12.22-A,25(f)(4)(i) to permit an increase in FAR of 35 percent on the [Q]C2-1VL-CDO zoned portion of the site to a maximum of 2.02:1 and 4.05:1 in the R3-1 zoned portion for an average of 2.24:1 FAR across the site;

        - Pursuant to LAMC Section 12.22-A,25(f)(5) to permit an increase in building height of 11 feet for a maximum height of 56 feet;

        - Pursuant to LAMC Section 12.22-A,25(f)(8) to permit the averaging of FAR, density, parking, and open space and permit vehicular access from a less restrictive zone to a more restrictive zone;

- West Pico Boulevard Community Design Overlay Plan Approval, pursuant to LAMC Section 13.08, for construction of a new building;

- Site Plan Review, pursuant to LAMC Section 16.05, to permit the construction, use, and maintenance of a new 5-story, multi-family residential building providing 129 residential units with two levels of subterranean parking;
- Advisory Agency approval for removal of protected and non-protected trees pursuant to LAMC Section 17.05-R,1(b);
- Street Tree Removal Permit;
- Haul route approval (if required);
- Demolition, grading, excavation, and building permits; and
- Other permits, ministerial or discretionary, as may be necessary pursuant to various sections of the LAMC from the City of Los Angeles Department of Building and Safety (and other municipal agencies) in order to execute and implement the Project. Such approvals may include, but are not limited to landscaping plan approvals, stormwater discharge permits, permits for temporary street closures, installation and hookup approvals for public utilities, and related permits.

4. RELATED PROJECTS

State *CEQA Guidelines* Section 15063(b) requires that Initial Studies consider the environmental effects of a proposed project individually as well as cumulatively. Cumulative impacts are two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (State *CEQA Guidelines* Section 15355). Cumulative impacts may be analyzed by considering a list of past, present, and probable future projects producing related or cumulative impacts (State *CEQA Guidelines* Section 15130[b][1][A]).

All proposed (those with pending applications), recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment when considered in conjunction with the Project are included in this Initial Study. For an analysis of the cumulative impacts associated with these related projects and the Project, cumulative impact discussions are provided under each individual environmental impact category in Section III, Environmental Impact Analysis, of this Initial Study.

Table II-5, List of Related Projects, lists 29 projects, including all approved, under construction, proposed, or reasonably foreseeable projects within the study area that are expected to be completed by the anticipated Project buildout and occupancy.

The list of related projects is not intended to be an exhaustive list of projects that may occur during the construction period, which cannot be known in an absolute way. Instead, the list is intended to demonstrate the reasonably anticipated magnitude of development that may occur in the study area during this period based on projects currently on file with appropriate local municipalities. Furthermore, the related projects list provides a conservative analysis as it is unlikely that all of the projects on the list will be developed due to various circumstances that could arise during the typical planning process. The location of the related projects are shown on Figure II-20, Location of Related Projects, following Table II-5.

Table II-5
List of Related Projects

ID	Project Type	Size	Location
1	Supermarket Improvements Existing Market & Retail	58,000 sf (62,266 sf)	11660 W. Santa Monica Blvd, City of Los Angeles
2	Specialty Retail Condominium	28,000 sf 138 du	3115 S. Sepulveda Blvd, City of Los Angeles
3	Pico-Sepulveda Mixed Use Apartments Commercial Mix Remove Industrial	 595 du 15,000 sf	11122 W. Pico Blvd, City of Los Angeles
4	YMCA Recreation Center	65,000 sf	1466 Westgate Ave, City of Los Angeles
5	Hudson Pacific Office re-use	250,283 sf	12333 W. Olympic Blvd, City of Los Angeles
6	Windward School Student Increase	 75 st	11350 Palms Blvd, City of Los Angeles
7	Martin Expo Town Center Apartments Grocery General Retail Quality Restaurant High Turnover Restaurant Fast Food Restaurant Creative Office Removal of Auto Dealership	 516 du 45,000 sf 4,000 sf 4,000 sf 4,000 sf 10,000sf 200,000 sf (99,399 sf)	12101 W. Olympic Blvd, City of Los Angeles
8	Mixed Use Apartment Specialty Retail	 89 du 6,030 sf	11421 W. Olympic Blvd, City of Los Angeles
9	Apartment Restaurant Remove Garden Nursery	52 du 3,300 sf	1900 S. Sawtelle Blvd, City of Los Angeles
10	Retail Store Replace Furniture & Ken Cranes	19,819 sf	11040 Pico Blvd, City of Los Angeles
11	Apartments Commercial	150 du 40,000 sf	11800 Santa Monica Blvd, City of Los Angeles
12	Remove Auto Repair Apartment Commercial	 30 du	1855 Westwood Blvd, City of Los Angeles
13	Apartments New Car Dealership	39 du 10,750 sf	11852 Santa Monica Blvd, City of Los Angeles
14	Creative Office[a]	215,000 sf	1681 26th St, City of Santa Monica

Table II-5
List of Related Projects

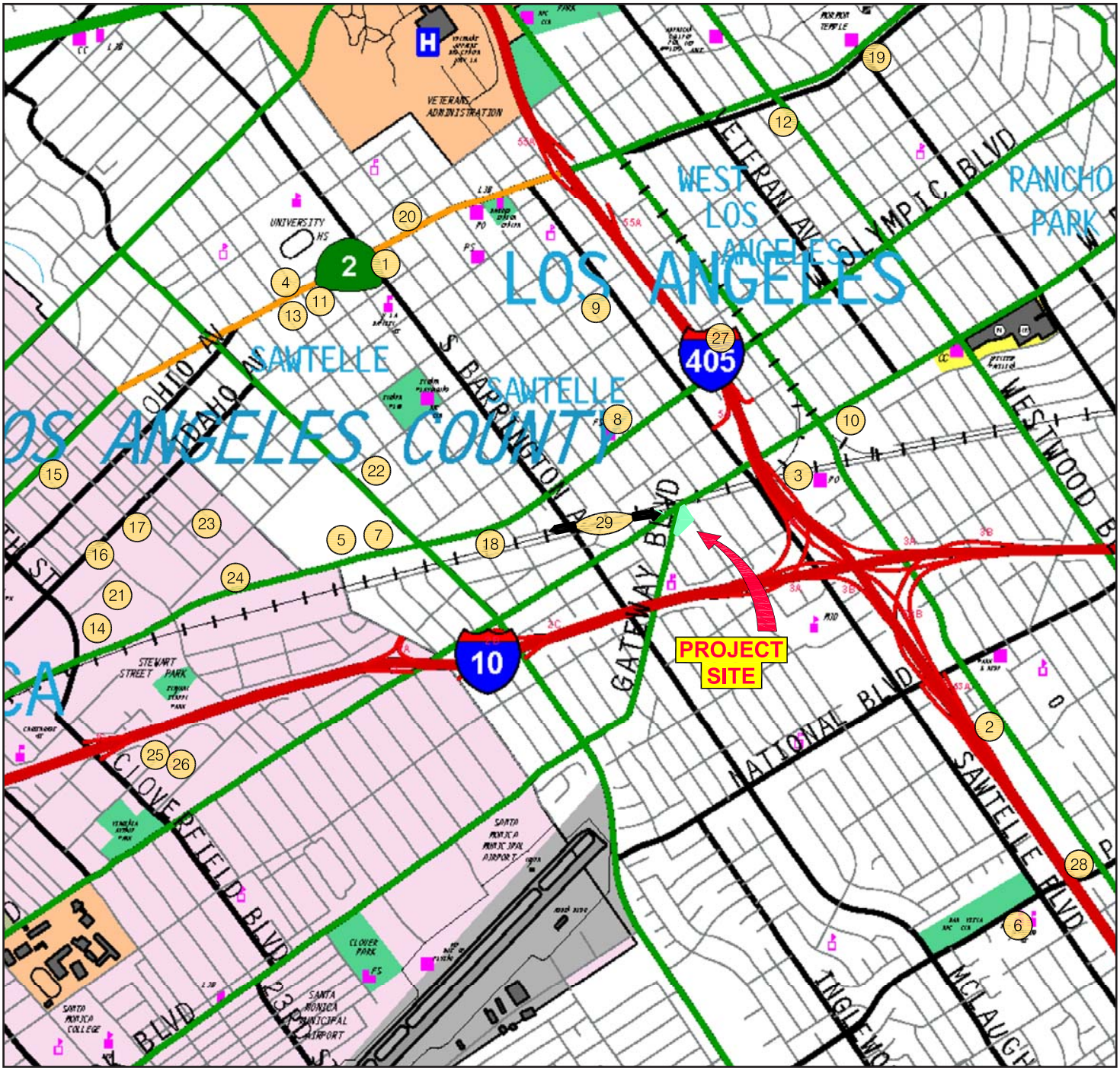
ID	Project Type	Size	Location
15	Residential Retail	26 du 3,500 sf	3008 Santa Monica Blvd, City of Santa Monica
16	Colorado Creative Studios Dev Ag Creative Office Neighborhood Retail	 191,982 sf 9,000 sf	2834 Colorado Ave, City of Santa Monica
17	Village Trailer Park[b] Condominiums Condo/Apartments Apartments Specialty Retail	 171 du 72 du 134 du 25,940 sf	2930 Colorado Ave, City of Santa Monica
18	School	500 st	11800 W. Olympic Blvd, City of Los Angeles
19	Retail Office	9,200 sf 35,000 sf	10700 Santa Monica Blvd, City of Los Angeles
20	Condominium Retail Commercial	72 du 4,500 sf 12,425 sf	11567 W. Santa Monica Blvd, City of Los Angeles
21	School	20,000 sf	1660 Steward St, City of Santa Monica
22	School	115,300 sf	3131 Olympic Blvd, City of Santa Monica
23	Condominiums Warehouse Retail	4 du 10,800 sf 15,250 sf	1621 Franklin St, City of Santa Monica
24	School Expansion	175 st	1905 Armacost Ave, City of Los Angeles
25	Condominium	45 du	1943-1959 High Pl, City of Santa Monica
26	Edison School	65,000 sf	2425 Kansas Ave, City of Santa Monica
27	Office	17,620 sf	2142 S. Pontius Ave, City of Los Angeles
28	Apartment Grocery Restaurant/Retail	302 du 36,978 sf 10,793 sf	Northeast corner of S. Sepulveda Blvd and Palms Blvd, City of Los Angeles
29	Exposition Transit Corridor Phase II	(Infrastructure improvement)	Culver City to City of Santa Monica via City of Los Angeles

sf = square feet; du = dwelling units; st = students

[a] *Hines Development of 427 apartments, 374,434 sf of office, 15,500 sf of restaurant, and 13,891 sf of retail denied by referendum. Replacement project is 215,000 sf of creative office (involves re-occupancy of vacant Papermate building).*

[b] *Per Village Trailer Park Recirculated EIR*

Source: Overland Traffic Consultants, 2017. (Appendix H)



Source: Overland Traffic Consultants, Inc., January 2016.

III. ENVIRONMENTAL IMPACT ANALYSIS

INTRODUCTION

This section of the Initial Study/Mitigated Negative Declaration (IS/MND) 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 the CEQA Guidelines Appendix G Environmental Checklist Form and the *L.A. CEQA Thresholds Guide* (2006).[1]

1. AESTHETICS

Senate Bill (SB) 743, effective January 1, 2014, deems aesthetic impacts of residential, mixed-use, or employment center infill projects located in defined transit priority project areas as less than significant under CEQA. Zoning Information File No. 2452 issued by the Department of City Planning includes a corresponding map of Transit Priority Areas (TPA) which identifies the site within a TPA, and therefore any aesthetic impacts, including but not limited to: (a) adverse effects on scenic vistas, (b) damage to scenic resources, (c) degradation of existing visual character, (d) light and/or glare and (e) shade/shadow are deemed less than significant as a matter of law. Notwithstanding the mandate imposed by SB 743, the following aesthetic analysis of the Project is provided for informational purposes only.

a) Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. A significant impact may occur if the development introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks views of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest). Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on a scenic vista shall be made considering the following factors:

- The nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or ocean);
- Whether a project affects views from a designated scenic highway, corridor, or parkway;
- The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and
- The extent to which a project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

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[1] *In 2010, the State CEQA Guidelines were revised to include greenhouse gas emissions, forestry resources, and changes to transportation/traffic. As directed by state Senate Bill 97, the Natural Resources Agency adopted Amendments to the CEQA Guidelines for greenhouse gas emissions on December 30, 2009. On February 16, 2010, the Office of Administrative Law approved the Amendments, and filed them with the Secretary of State for inclusion in the California Code of Regulations. These amendments became effective on March 18, 2010. Although the City has updated the checklist to reflect the State CEQA Guidelines changes, the L.A. CEQA Thresholds Guide, which was developed prior to the changes, has not been updated.*

The Project site is relatively flat and currently developed with two one-story structures containing commercial uses, including a dry cleaner, restaurant, automotive service facilities, and tire store as well as associated surface parking lot areas in the front and rear of the site (see Figure II-3, Views of the Project Site in Section II of this IS/MND). There are no prominent topographical features on the Project site from which scenic vistas could be viewed, nor does the Project site contain a scenic vista. Visual resources within the vicinity of the Project site with the potential to be considered scenic include the views of the Santa Monica Mountains. It should be noted that under the *L.A. CEQA Thresholds Guide*, a significant impact occurs only when a proposed project adversely affects the public view of a scenic vista, and therefore, impacts to private views are not considered to be significant. Views of the Santa Monica Mountains from the Project site are not readily available at the street level due to the distance of these mountains (approximately three miles to the north) and the existing built environment between the mountains and the Project site, which consists building structures of varying heights including mid- and high-rise buildings. Likewise, the existing viewshed at the Project site is defined by existing urban development.

The Project would construct a five-story, maximum 56-foot-tall building, which would extend beyond the height of the existing one-story structures on site. The new building would not directly obstruct an existing public view of a scenic vista as such views are already very limited, and the additional building height at the Project site would not otherwise substantially affect such already-limited views. Moreover, the Project is located within a TPA, and as discussed above, aesthetics impacts are less than significant for residential projects within a TPA. Therefore, impacts would be less than significant and no mitigation measures are required.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact would occur if scenic resources would be damaged and/or removed by development of a project.

There are no State-designated scenic highways or highways eligible for scenic designation in the Project site vicinity.[2] There are also no locally-designated scenic highways in the Project Site vicinity.[3] Moreover, there are no rock outcroppings or historic buildings on site (see Figure II-2 in Section II, Project Description, of this IS/MND; and the discussion under threshold question 5.a], below). However, as is discussed in further detail under threshold question 4.e), the two on-site trees are native sycamore trees, which are protected species as defined by City Ordinance No. 177,404. While native trees may provide scenic value to a site, these on-site native trees are currently limited in scenic value as they are located in the rear of the Project site in the area of the ancillary surface parking lot near Butler Avenue and behind the existing on-site commercial buildings. Mitigation measure MM 4-1, discussed below, would require the replacement of these removed protected trees at a 2:1 ratio. Removal of these native trees and their subsequent replacement would not constitute a significant impact to scenic resources on site, particularly as the Project is located within a TPA. Therefore, impacts would be less than significant and no mitigation measures are required.

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[2] *California Department of Transportation, California Scenic Highway Mapping System, Los Angeles County, website: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed: January 2016.*

[3] *City of Los Angeles Department of City Planning, Mobility Plan 2035, Citywide General Plan Circulation System, Map A3 – West Subarea, May 28, 2015.*

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. A significant impact may occur if the development introduced incompatible visual elements on the project site or visual elements that would be incompatible with the character of the area surrounding the project site.

General Character Significance Methodology

Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project that is located outside of a TPA will result in a significant aesthetic impact shall be made considering the following factors:

- The amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community, or localized area, which would be removed, altered or demolished;
- The amount of natural open space to be graded or developed;
- The degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site, through appropriate design, etc.;
- The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image;
- The degree to which the project would contribute to the area's aesthetic value; and
- Applicable guidelines and regulations.

The Project site is located in an urbanized setting of West Los Angeles. The surrounding area is characterized by commercial, residential, and warehouse/storage uses. Land uses that immediately abut the Project site include commercial, multi- and single-family residential. Building structures near the Project site vary in height from one to five stories. The Project would construct a 5-story, maximum 56-foot tall building at the site, which is four stories greater than the buildings that occupy the Project site currently. Thus, the Project would result in a change in the visual character of the Project site and surrounding area. The following discussion addresses the extent and significance of the change to the visual character resulting from Project implementation.

Height

The Project's proposed building would be to a maximum of 56 feet in height (5 stories) and would be concentrated within the commercially-zoned portion of the site along the street fronts. A building containing four 2-bedroom, 2-story townhome-type units would be located in the rear of the Project site in the residentially-zoned portion. Existing buildings that abut the Project site range from one to three stories in height with buildings farther east and southeast of the Project site consisting of four stories as well as a five-story building three blocks east of the site. Although the Project would result in a change in building height from the existing conditions, it would not substantially contrast with the existing heights and character of the Project area in general. There are several buildings with generally similar heights in the Project area currently:

- Four-story multi-family residential use, located approximately 160 feet east of the Project site along Purdue Avenue and directly south of another four-story multi-family residential use (one block away);
- Four-story multi-family residential use, located approximately 180 feet east of the Project site, at the southwest corner of Exposition Boulevard and Purdue Avenue and directly north of another four-story multi-family residential use (one block away);
- Four-story multi-family residential use, located approximately 220 feet northwest of the Project site, adjacent to the Metro Rail Expo Line;
- Four-story multi-family residential use, located approximately 520 feet southeast of the Project site along Purdue Avenue (one block away);
- Four-story multi-family residential use, located approximately 560 feet east of the Project site along Corinth Avenue (two blocks away);
- Four-story multi-family residential use, located approximately 715 feet east of the Project site at the southeast corner of Exposition Boulevard and Corinth Avenue (three blocks away); and
- Five-story multi-family residential use, located approximately 890 feet east of the Project site at the southwest corner of Exposition Boulevard and Sawtelle Boulevard (three blocks away)

Considering the existing building heights in the area, as well as the Project concentrating the primary building along the street fronts in the commercially-zoned portion of the site at the greatest distance feasible from the single-family residences to the southeast, the height of the Project would not introduce an incompatible element to the existing visual character of the area. Therefore, the visual quality and character impact associated with the proposed building's height would be less than significant and no mitigation measures are required.

Massing

In addition to the increased height, the Project would increase the building mass on the Project site. The resulting building would likely be visually prominent in the immediately surrounding area compared to the existing uses at the Project site. This increased visibility would occur on nearby roadways and adjoining sidewalks, including Exposition Boulevard/Pico Boulevard, Gateway Boulevard, Colby Avenue, and Butler Avenue bordering the site. The greater height and mass would increase the visibility of the Project site from nearby residential and commercial properties. However, the Project would be visually integrated with the existing character of the area from a height and massive perspective in a general sense.

Moreover, Pico Boulevard is a major commercial corridor throughout the City, and west of the San Diego Freeway (Interstate 405), which includes the Project site, this roadway is part of the West Pico Boulevard Community Design Overlay District (CDO). The planning and policy intent for this portion of Pico Boulevard in West Los Angeles (per the West Pico Boulevard CDO) is to create a successful and well-designed district. The area within this CDO near the Project site is currently characterized by older 1- and 2-story buildings with little architectural interest. The CDO is part of the planning efforts to revitalize West Pico Boulevard. The Project would be an urban-scale development that would be reflective of the expected visual character of the area as it develops as part of the West Pico Boulevard CDO revitalization efforts and in accordance with adopted land use plans, including the Palms-Mar Vista-Del Rey Community Plan (See also Section 10, Land Use and Planning, of this Environmental Impact Analysis section, below).

The rear portion of the Project abuts single-family home uses in the R1 Zone. Pursuant to LAMC Section 12.21.1-A,10, the proposed building containing four 2-bedroom, 2-story townhome-type units located in the rear of the Project site in the residentially-zoned portion would not exceed 25 feet in height within 0-50 feet from the adjacent R1 lot. The Project massing would be concentrated within the commercially-zoned portion of the Project site along Gateway Boulevard and Colby Avenue. Thus, the Project would not result in massing impacts to the off-site single-family uses. Moreover, utilizing the incentives available to the Project as set forth by the City's Density Bonus Ordinance, the Applicant is requesting an increase in the floor-to-area ratio (FAR) of 35 percent from 1.5:1 to 2.02:1 in the commercially-zoned portion of the site and 4.05:1 in the residentially-zoned portion of the site for an average of 2.24:1 FAR across the entire Project site. This requested FAR would facilitate the provision of housing more comparable in size to the existing housing in the area, as well as accommodate the Project's affordable housing components.

Nonetheless, considering the existing urban environment and surrounding area, concentrated mass along the street fronts, and the Project's consistency with the visual character part of the West Pico Boulevard CDO guidelines, the proposed massing of the Project would not result in a substantial change to the visual character or the quality of the site and its surroundings. Therefore, the visual character impact associated with building mass would be less than significant and no mitigation measures are required.

Architectural Style and Urban Design

The buildings in the surrounding the Project site vary in age and architectural style from more contemporary buildings to older buildings with little architectural interest and post-war housing styles from 1940s and 1950s. The proposed Project's design is a contemporary style that is compatible with the more contemporary designs that have been incorporated in buildings constructed in the area over the recent decade such as the four-story multi-family residential building to the northwest adjacent to the Metro Rail Expo Line. The Project has been designed to comply with the West Pico Boulevard CDO. The design alternates different textures, colors, materials, and distinctive architectural treatments to add visual interest while avoiding dull and repetitive facades. See Figure II-20 in Section II, Project Description, of this IS/MND.

As part of the Project, landscaping and material improvements to the public right-of-way along Butler Avenue immediately adjacent to the Project is integrated into the design in order to prevent curb cuts along Gateway Boulevard and Colby Avenue, which would utilize an otherwise underutilized and under-improved alleyway. Bicycle infrastructure and parking is accessed from Butler Avenue, further activating the space.

As a result of the proposed architectural style and urban design on the Project site, the proposed Project would be effectively integrated into the aesthetics of the area by means of design, architecture, size, massing, and location as well as with future developments. Furthermore, the proposed Project's location, height, scale, and architectural features are generally compatible with existing and planned development for the Palms-Mar Vista-Del Rey Community Plan area and are compliant with the City's Zoning Code with the requested Density Bonus regulations. Therefore, the visual character impact associated with architectural style and urban design would be less than significant and no mitigation measures are required.

d) Would the project 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 may occur if the development introduces new sources of light or glare on or from a project site which would be incompatible with the surrounding areas, or

which pose a safety hazard to motorists utilizing adjacent streets. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project will result in a significant nighttime illumination impact shall be made considering the following factors:

- The change in ambient illumination levels as a result of project sources; and
- The extent to which project lighting would spill off the project site and effect adjacent light-sensitive areas.

Light

The Project is located in a well-lit urban area of the City where there are moderate to high levels of ambient nighttime lighting, including street lighting, vehicle headlights, architectural and security lighting, and indoor building illumination (light emanating from structures which passes through windows), all of which are common to densely populated areas. Artificial light impacts are largely a function of proximity. The Project site is located within an urban environment, so that light emanating from any one source contributes to lighting impacts rather than being solely responsible for lighting impacts on a particular use. As uses surrounding the Project site are already impacted by lighting from existing development within the area, the amount of new light sources must be highly visible from light-sensitive uses to have any notable effect.

The Project would have the potential to alter lighting patterns in the area of the Project site as compared with the existing one-story commercial structures and surface parking lot on site. Night lighting for the Project would be provided to illuminate building entrances, driveways, and for security. Additionally, headlight from vehicles entering and exiting the Project parking area at night would be an increased source of light at the Project site due to the greater intensity of use at the site. However, light from vehicle headlights would not directly shine upon any nearby light-sensitive land use as the Project's ingress/egress from Butler Avenue is adjacent to commercial uses.

Current sources of light associated with the Project site include street lights, vehicle headlights, security lights, and indoor building illumination. It is anticipated that the amount of light emanating from the Project would represent an increase over current light levels. As a Project design feature intended to ensure lighting impacts would not result, outdoor lighting would be designed and installed with shielded so that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above. Therefore, impacts would be less than significant and no mitigation measures are required.

Glare

Glare is a common phenomenon in the Southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potential reflective surfaces in the Project vicinity include vehicles traveling and parked on streets in the vicinity of the Project site and exterior building windows. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area.

The Project would incorporate both solid and glass surfaces. Exterior portions of the proposed building would utilize various non-reflective material designed to minimize the transmission of glare from buildings. Project parking would be located at-grade within the building structure and below ground, minimizing potential glare from vehicles. As a Project design feature, the exterior of the proposed building would be constructed of high-performance, non-reflective materials to minimize glare and reflected heat.

Moreover, the Project would not use polished metals in its design. Therefore, impacts would be less than significant and no mitigation measures are required.

Shade/Shadow

The issue of shade and shadow pertains to the blockage of direct sunlight by buildings, which may affect adjacent properties. The effects of shading are site specific. As described in the *L.A. CEQA Thresholds Guide*, shadow effects are dependent upon several factors, including the local topography, the height and bulk of a project's structural elements, sensitivity of adjacent land uses, season, and duration of shadow projection. Facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered to be sensitive because sunlight is important to function, physical comfort, or commerce.

As described in the *L.A. CEQA Thresholds Guide*, a significant impact would generally occur if the development introduced light-blocking structures in excess of 60 feet in height above the ground elevation that would be located within a distance of three times the height of the proposed structure to a shadow-sensitive use on the north, northwest, or northeast. However, Exposition Boulevard/Pico Boulevard and an adult-oriented commercial use are located to the north/northwest/northeast of the Project site. These roadways and commercial use are not considered shadow-sensitive. Additionally, the proposed building would be 56 feet in height. Thus, the Project would not cast shade/shadow on sensitive land uses. Therefore, impacts would be less than significant and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the topics listed in the aesthetics analysis above, including views, scenic resources, shade/shadow, etc.

The nearest related projects to the Project site are the following (see Figure II-21 in Section II, Project Description, of this IS/MND):

- Related Project No. 29 (Exposition Transit Corridor Phase 2), which is an transit infrastructure improvement project that follows the Exposition Boulevard alignment in the area of the Project site and is approximately 115 north of the Project site;
- Related Project No. 8 (Mixed Use), which consists of 89 multi-family residential units and 6,030 square feet of specialty retail located at 11421 W. Olympic Boulevard approximately 0.26 mile north of the Project site;
- Related Project No. 3 (Pico-Sepulveda Mixed Use), which consists of 595 multi-family residential units and 15,000 square feet of commercial mix located at 11122 W. Pico Boulevard approximately 0.29 mile east of the Project site; and
- Related Project No. 18 (School), which consists of a 500-student school located at 11800 W. Olympic Boulevard, approximately 0.46 mile west of the Project site.

As the Project vicinity is a developed, urbanized area, there are numerous existing buildings of varying heights and mature vegetation including tall trees with dense foliage obstructing the view between the Project site and Related Project Nos. 8, 3, and 18. Moreover, Related Project No. 3 is located across the

San Diego Freeway (Interstate 405), which is an elevated freeway in the area of the Project site. Related Project No. 29, is an elevated "fly-over" rail transit infrastructure line in the area of the Project site. With the exception of Related Project No. 29 the nearest related projects are not within a clear viewshed of the Project site. As Related Project No. 29 is a transit project, its aesthetic impacts are unlike the type considered for the Project's potential cumulative impacts as it is an infrastructure project. Similarly, potential views of other related projects are also obstructed by existing built environment and tall trees, and are not located within the field of view of the Project site. Therefore, the Project's viewshed would not be substantially impacted by development of the related projects, and the related projects would not combine with the Project to result in a cumulative aesthetic impact.

Any additional future development that would be clearly within the Project's viewshed are reasonably expected to occur in accordance with adopted plans and regulations, and be subject to the review and approval of the Department of City Planning prior to issuance of grading permits. Any approvals granted to future development projects, including the listed related projects in Section II.5, Related Projects, are reasonably anticipated to allow landscape and signage that would be aesthetically compatible with the surrounding neighborhood. As discussed above, the Project would result in less than significant impacts to aesthetics and would improve the existing visual character and quality of the Project site. Considering all of the above, the cumulative aesthetic impact would be less than significant and no mitigation measures are required.

2. AGRICULTURE AND FORESTRY RESOURCES

a) Would the project 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. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to result in the conversion of State-designated Farmland to non-agricultural use.

The Project site is entirely developed with commercial land uses and associated surface parking lot areas, and is located in a highly urbanized area of the City. According to the State Farmland Mapping and Monitoring Program's most recent Farmland mapping data for Los Angeles County, neither the Project site nor the surrounding area are designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[4] Thus, Project implementation would not result in the loss of State-designated Farmland. Therefore, no impact would occur and no mitigation measures are required.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?

No Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to a non-agricultural use.

The Project site is zoned [Q]C2-1VL-CDO (Commercial use [Qualified] – Very Limited Height District No. 1VL – Community Design Overlay District) on the portion that currently includes the commercial

[4] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2012, published January 2015, website: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/los12.pdf, accessed: January 2016.*

structures, and R3-1 (Multiple Family Residential – Height District No. 1) on the portion that currently includes an ancillary surface parking lot in the rear of the site. As such, the Project site is not zoned for agricultural use, nor are there any agricultural uses currently occurring at the Project site or within the surrounding area. Moreover, according to the State's most recent Williamson Act land data, neither the Project site nor surrounding area are under a Williamson Act contract.[5] Thus, Project implementation would not conflict with Williamson Act contact land nor would the Project conflict with agricultural zoning. Therefore, no impact would occur and no mitigation measures are required.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12222(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. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to result in the conversion of land zoned 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)).

In the City, forest land is a permitted use in areas zoned OS (Open Space); however, the City does not have specific zoning for timberland or Timberland Production. The Project site is zoned [Q]C2-1VL-CDO (Commercial use [Qualified] – Very Limited Height District No. 1VL – Community Design Overlay District) on the portion that currently includes the commercial structures, and R3-1 (Multiple Family Residential – Height District No. 1) on the portion that currently includes an ancillary surface parking lot in the rear of the site for the commercial uses. The existing zoning at the Project site does not include or permit forest land, timberland, or Timberland Production land uses. Therefore, no impact would occur and no mitigation measures are required.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to result in the loss of forest land or conversion of forest land to non-forest use.

The Project site is entirely developed with commercial land uses and associated surface parking lot areas, and is located in a highly urbanized area of the City. No forest land exists on or in the vicinity of the Project site, and Project implementation would not result in the loss or conversion of forest land. See also the discussion under threshold question 2.c), above. Therefore, no impact would occur and no mitigation measures are required.

[5] *State of California Department of Conservation, Division of Land Resource Protection, State of California Williamson Act Contract Land, Data Submissions Current to 2014, published 2015, website: ftp://ftp.consrv.ca.gov/pub/dlrp/wa/2104%20Statewide%20Map/WA_2014_11x17.pdf, accessed: January 2016.*

e) Would the project 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. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project indirectly results in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

As discussed in the above threshold questions, the Project site is entirely developed and located in a highly urbanized area of the City. No agricultural uses, designated Farmland, or forest land uses occur at the Project site or within the surrounding area. As such, implementation of the Project would not result in the conversion of existing Farmland, agricultural uses, or forest land on- or off-site. Therefore, no impact would occur and no mitigation measures are required.

Cumulative Impacts

No Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the topics listed in the analysis above, including State-designated Farmland, agricultural uses, and forest land uses. The cumulative impacts study area for agriculture and forestry resources is the extent of the related projects (see Figure II-21, Location of Related Projects, in Section II, Project Description). The Project site and related projects are located in a developed area of the City, and none of these respective sites contain State-designated Farmland.[6] Neither the Project Site nor the related projects are located on land currently used as agriculture or forest land, or on land zoned for agricultural uses or forest land, timberland, or Timberland Production. Thus, neither the Project nor the related projects would result in the conversion of existing agricultural uses or zoning to a non-agricultural use, nor result in the loss of forest land, timberland, Timberland Production or zoning, or the conversion of forest land to non-forest use. Therefore, there would be no cumulative impacts on agriculture and forestry resources and no mitigation measures are required.

3. AIR QUALITY

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. A significant air quality impact may occur if a project is not consistent with the applicable Air Quality Management Plan (AQMP), or would in some way represent a substantial hindrance to employing the policies, or obtaining the goals, of that plan.

The South Coast Air Quality Management District (SCAQMD) is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources to meet federal and State ambient air quality standards. It has responded to this requirement by preparing a series of AQMPs. The Governing Board of SCAQMD adopted the most recent of these on December 7, 2012.[7] This AQMP, referred to as

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[6] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2012, published January 2015, website: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/los12.pdf, accessed: January 2016.*

[7] *The Draft 2016 AQMP was published on June 30, 2016, as of February 6, 2017, the 2016 AQMP has not yet been adopted.*

the 2012 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the South Coast Air Basin ("Basin"), to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. The 2012 AQMP identifies the control measures that will be implemented over a 20-year horizon to reduce major sources of pollutants. Control measures established in the previous AQMPs has substantially decreased exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Basin.

The future air quality levels projected in the 2012 AQMP are based on several assumptions. For example, SCAQMD assumes that general new development within the Basin will occur in accordance with population growth and transportation projections identified by the Southern California Association of Governments (SCAG) in its most current version of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which was adopted on April 4, 2012. The 2012 AQMP also assumes that general development projects will include strategies (mitigation measures) to reduce emissions generated during construction and operation in accordance with SCAQMD and local jurisdiction regulations, which are designed to address air quality impacts and pollution control.

For development projects, SCAQMD recommends that consistency with the current AQMP be determined by comparing the population generated by a project to the population projections used in the development of the AQMP. Projects that are consistent with SCAG's applicable growth projections would not interfere with air quality attainment because this growth is included in the projections used in the formulation of the 2012 AQMP. As such, projects, land uses, and activities that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed SCAQMD's recommended daily emissions thresholds. The Project would comply with all SCAQMD rules and regulations that are in effect at the time of development and that are applicable to the Project; the Project Applicant is not requesting any exemptions from the currently adopted or proposed rules.

The Project would involve the demolition of existing uses and the construction of 129 multi-family residential units and LAMC-required parking, which would be provided at grade and within a 2-level subterranean parking structure. As discussed under threshold question 13.a), below, while the Project would increase population and housing totals, the Project would not conflict with the regional growth projections for the Los Angeles Subregion. In addition, and further discussed herein, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, the Project would not impair implementation of the AQMP, and impacts would be less than significant. No mitigation measures are required.

b) Would the project 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. To address potential impacts from construction and operation, SCAQMD currently recommends that impacts from projects with mass daily emissions that exceed any of the thresholds outlined in Table III-1, SCAQMD Thresholds of Significance, be considered significant. The City defers to these thresholds for the evaluation of construction and operational air quality impacts.

Table III-1
SCAQMD Thresholds of Significance

Pollutant	Construction Thresholds (lbs/day)	Operational Thresholds (lbs/day)
Volatile Organic Compounds (VOC)	75	55
Nitrogen Oxides (NO_x)	100	55
Carbon Monoxide (CO)	550	550
Sulfur Oxides (SO_x)	150	150
Particulate Matter (PM_{10})	150	150
Fine Particulate Matter ($PM_{2.5}$)	55	55

lbs = pounds

Source: SCAQMD CEQA Handbook, SCAQMD Air Quality Significance Thresholds, website: http://aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2, accessed: February 2017.

Regional Construction Emissions

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 20 months. This assumption is conservative and yields the maximum daily impacts. Construction activities associated with the Project would be undertaken in three main steps: (1) demolition of existing uses, 2) grading/excavation/foundation preparation, and (3) building construction.

Demolition and site clearing would occur for approximately one month (22 construction days) and would require the demolition and removal of 14,594 square feet of existing uses as well as surface parking lot areas. This analysis assumes daily on-site demolition activities would require the following equipment: one concrete/industrial saw, one rubber tired dozer, and two tractors/loaders/backhoes.

Grading, excavation and foundation preparation would occur for approximately three months (66 construction days) and this analysis assumes the export of up to approximately 34,500 cubic yards of soil. This analysis assumes daily grading, excavation and foundation preparation activities would require the following equipment: one excavator, one rubber tired dozer, and two tractors/loaders/backhoes.

Building construction would occur for approximately 16 months (352 construction days) and would include the construction of the proposed structure, connection of utilities, laying irrigation for landscaping, architectural coatings, and landscaping the Project site. This analysis assumes that the maximum daily construction building activities would require the following equipment: one crane, two forklifts, two tractors/loaders/backhoes, and one air compressor.

These construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving grading and site preparation would primarily generate fine particulate matter ($PM_{2.5}$) and respirable particulate matter (PM_{10}) emissions. Mobile sources (such as diesel-fueled equipment on site and traveling to and from the Project site) would primarily generate nitrogen oxides (NO_x) emissions. The application of architectural coatings would primarily result in the release of reactive organic gases (ROG) emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time. The analysis of daily construction emissions has been prepared utilizing the California Emissions Estimator Model (CalEEMod; version 2016.3.1) recommended by SCAQMD. Due to the construction timeframe and the normal day-to-day variability in construction activities, it is difficult, if not impossible, to precisely quantify the daily emissions associated with each phase of the proposed

construction activities. Nonetheless, Table III-2, Estimated Peak Daily Construction Emissions, lists daily emissions that are estimated to occur on peak construction days for each construction phase. These calculations assume that appropriate dust control measures would be implemented as part of the Project during each phase of development, as required by SCAQMD Rule 403 – Fugitive Dust.

Table III-2
Estimated Peak Daily Construction Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Demolition Phase						
Fugitive Dust	--	--	--	--	0.42	0.06
Off-Road Diesel Equipment	1.06	9.43	7.78	0.01	0.62	0.59
On-Road Diesel (Hauling)	0.05	1.65	0.36	0.01	0.10	0.03
Worker Trips	0.06	0.05	0.50	0.01	0.11	0.03
Total Emissions	***1.17***	***11.13***	***8.64***	***0.03***	***1.25***	***0.71***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Grading/Excavation/Foundation Phase						
Fugitive Dust	--	--	--	--	0.37	0.19
Off-Road Diesel Equipment	0.84	8.63	7.34	0.01	0.51	0.47
On-Road Diesel (Hauling)	0.87	27.23	6.02	0.07	1.70	0.54
Worker Trips	0.06	0.05	0.50	0.01	0.11	0.03
Total Emissions	***1.77***	***35.91***	***13.86***	***0.09***	***2.69***	***1.23***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Building Construction Phase						
Building Construction Off-Road Diesel Equipment	1.08	11.03	7.75	0.01	0.71	0.65
Building Construction Vendor Trips	0.12	2.95	0.88	0.01	0.17	0.06
Building Construction Worker Trips	0.73	0.55	5.92	0.01	1.34	0.36
Architectural Coatings	25.46	--	--	--	--	--
Architectural Coating Off-Road Diesel Equipment	0.24	1.68	1.83	0.01	0.11	0.11
Architectural Coatings Worker Trips	0.12	0.09	0.96	0.01	0.27	0.07
Total Emissions	***27.75***	***16.30***	***17.34***	***0.05***	***2.60***	***1.25***
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No

Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust. Calculation sheets are provided in Appendix A to this IS/MND.

Source: Pomeroy Environmental Services, 2017.

It is mandatory for all construction projects in the Basin to comply with SCAQMD Rule 403 for fugitive dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, using a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project site, and maintaining effective cover

over exposed areas. Compliance with Rule 403 would reduce regional particulate emissions associated with construction activities. Therefore, the impact would be less than significant. To ensure compliance with this applicable rule, the following regulatory compliance measure is recommended.

Regulatory Compliance Measure

RCM 3-1. All unpaved construction areas shall be wetted at least three times daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 61 percent.

As shown in Table III-2, above, construction-related daily emissions associated with the Project would not exceed any regional SCAQMD significance thresholds for criteria pollutants during the construction phases. Therefore, regional construction impacts would be less than significant and no mitigation measures are required.

Regional Operational Emissions

Existing Conditions

The Project site is currently developed with approximately 14,594 square feet of existing uses consisting of a dry cleaner, restaurant, automotive service facilities, and a tire store. As such, air pollutant emissions are currently generated by area sources, energy demand, and mobile sources such as motor vehicle traffic traveling to and from the Project site. The average daily emissions generated by the existing uses at the Project site have been estimated utilizing CalEEMod (version 2016.3.1) recommended by SCAQMD. As shown in Table III-3, Existing Daily Operational Emissions at Project Site, motor vehicles are the primary source of air pollutant emissions associated with existing uses.

Table III-3
Existing Daily Operational Emissions at Project Site

Emissions Source	Emissions in Pounds per Day					
	ROG	NOx	CO	SOx	PM10	PM2.5
Summertime (Smog Season) Emissions						
Area Sources	0.33	<0.01	<0.01	0.00	<0.01	<0.01
Energy Demand	0.02	0.17	0.14	<0.01	0.01	0.01
Mobile (Motor Vehicles)	1.53	5.43	14.41	0.03	1.71	0.50
Total Existing Emissions	**1.88**	**5.60**	**14.55**	**0.03**	**1.72**	**0.51**
Wintertime (Non-Smog Season) Emissions						
Area Sources	0.33	<0.01	<0.01	0.00	<0.01	<0.01
Energy Demand	0.02	0.17	0.14	<0.01	0.01	0.01
Mobile (Motor Vehicles)	1.50	5.52	14.37	0.03	1.71	0.50
Total Existing Emissions	**1.85**	**5.69**	**14.51**	**0.03**	**1.72**	**0.51**

Note: Calculation sheets are provided in Appendix A to this IS/MND. Column totals may not add due to rounding from the model results.

Source: Pomeroy Environmental Services, 2017.

Proposed Project

Operational emissions would be generated from normal day-to-day activities of the Project. Area source emissions would be generated by consumer products and architectural coatings, energy related emissions would be generated by the use of natural gas, and mobile source emissions would be generated by motor vehicles traveling to and from the Project site. The analysis of daily operational emissions associated with the Project has been prepared using CalEEMod (version 2016.3.1), recommended by SCAQMD. The results of these calculations are presented in Table III-4, Estimated Daily Operational Emissions. As shown, the operational emissions generated by the Project would not exceed the regional thresholds of significance set by SCAQMD. Therefore, impacts associated with regional operational emissions from the Project would be less than significant and no mitigation measures are required.

Table III-4
Estimated Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Summertime (Smog Season) Emissions						
Area Sources	2.47	2.05	11.51	0.01	0.21	0.21
Energy Demand	0.04	0.36	0.15	<0.01	0.03	0.03
Mobile (Motor Vehicles)	1.80	8.48	24.82	0.08	6.31	1.74
Total Project Emissions	***4.32***	***10.89***	***36.49***	***0.10***	***6.56***	***1.99***
Less Existing Project Site Emissions	*1.88*	*5.60*	*14.55*	*0.03*	*1.72*	*0.51*
Project Net Increase Emissions	**2.44**	**5.29**	**21.94**	**0.07**	**4.84**	**1.48**
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No
Wintertime (Non-Smog Season) Emissions						
Area Sources	2.47	2.05	11.51	0.01	0.21	0.21
Energy Demand	0.04	0.36	0.15	<0.01	0.03	0.03
Mobile (Motor Vehicles)	1.76	8.72	23.58	0.08	6.31	1.74
Total Project Emissions	***4.27***	***11.13***	***35.25***	***0.09***	***6.56***	***1.99***
Less Existing Project Site Emissions	*1.85*	*5.69*	*14.51*	*0.03*	*1.72*	*0.51*
Project Net Increase Emissions	**2.42**	**5.44**	**20.74**	**0.06**	**4.84**	**1.48**
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No

Note: Calculation sheets are provided in Appendix A to this IS/MND. Column totals may not add due to rounding from the model results.

Source: Pomeroy Environmental Services, 2017.

c) Would the project 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 a federal or State non-attainment pollutant.

Because the Basin is currently in non-attainment for ozone (O_3), PM_{10} and $PM_{2.5}$, the Project, in combination with the related projects may exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of the Project's contribution, SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed using the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions impacts, then the development project would not contribute to a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment.

As discussed above, the mass daily construction and operational emissions generated by the Project would not exceed any of the thresholds of significance recommended by SCAQMD. Also, as discussed under question 3.d), below, localized emissions generated by the Project would not exceed SCAQMD's Localized Significance Thresholds (LSTs). Therefore, the Project would not contribute a cumulatively considerable increase in emissions for the pollutants under which the Basin is in non-attainment, and no mitigation measures are required.

d) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors.

Land uses that are considered to be more sensitive to changes in air quality than others are referred to as sensitive receptors. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be sensitive to poor air quality because the very young, the older adults, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residences are considered to be sensitive because people are often at home and could be exposed to pollutants for extended periods of time. Recreational areas are considered to be moderately sensitive to poor air quality because vigorous exercise associated with recreation places a high demand on the human respiratory function. The nearest air quality sensitive receptors to the Project site are residences approximately 10 feet to the south of the Project site.

Localized Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. SCAQMD has developed 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 are provided for each Source Receptor Area (SRA) and various distances from the source of emissions. In the case of this analysis, the Project Site is located within SRA 2, covering the Northwest Los Angeles County Coastal area. As noted above, the nearest sensitive receptor to the Project site are

the residences approximately 10 feet to the south. The closest receptor distance in SCAQMD's mass rate look-up tables is 25 meters (82 feet). Projects that are located closer than 25 meters to the nearest receptor are directed to use the LSTs for receptors located within 25 meters. Additionally, the Project site is approximately 0.99 acre in size. As such, and consistent with SCAQMD recommendations, the localized thresholds for a 1-acre site with a receptor distance of 25 meters (82 feet) in SCAQMD's SRA 2 have been used to address the potential localized NO_X, carbon monoxide (CO), PM_{10}, and $PM_{2.5}$ impacts to the area surrounding the Project site.

As shown in Table III-5, Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within the Project site during construction activities for each phase would not exceed the applicable construction LSTs for a 1-acre site in SRA 2. Therefore, localized air quality impacts from construction activities on sensitive receptors would be less than significant and no mitigation measures are required.

Table III-5
Localized On-Site Peak Daily Construction Emissions

Construction Phase [a]	Total On-site Emissions (Pounds per Day)			
	NO_x [b]	CO	PM_{10}	$PM_{2.5}$
Demolition Emissions	**9.43**	**7.78**	**1.05**	**0.66**
SCAQMD Localized Thresholds	*103.00*	*562.00*	*4.00*	*3.00*
Potentially Significant Impact?	No	No	No	No
Grading/Excavation/Foundation Emissions	**8.63**	**7.34**	**0.88**	**0.66**
SCAQMD Localized Thresholds	*103.00*	*562.00*	*4.00*	*3.00*
Potentially Significant Impact?	No	No	No	No
Building Construction Emissions	**12.71**	**9.58**	**0.82**	**0.76**
SCAQMD Localized Thresholds	*103.00*	*562.00*	*4.00*	*3.00*
Potentially Significant Impact?	No	No	No	No

Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust. Building construction emissions include architectural coatings. Calculation sheets are provided in Appendix A to this IS/MND.

[a] *The Project site is 0.99 acre. Consistent with SCAQMD recommendations, the localized thresholds for all phases are based on 1-acre site with a receptor distance of 25 meters (82 feet) in SCAQMD's SRA 2.*

[b] *The localized thresholds listed for NO_x in this table takes into consideration the gradual conversion of NO_x to NO_2, and are provided in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by SCAQMD. As discussed previously, the analysis of localized air quality impacts associated with NO_x emissions is focused on NO_2 levels as they are associated with adverse health effects.*

Source: Pomeroy Environmental Services, 2017.

With regard to localized emissions from motor vehicle travel, traffic congested roadways, and intersections have the potential to generate localized high levels of CO. SCAQMD suggests conducting a CO hotspots analysis for any intersection where a project would worsen the Level of Service (LOS) from between LOS A and LOS C to any level below LOS C, and for any intersection rated LOS D or worse where the project would increase the volume-to-capacity ratio by two percent or more. Based on a review of the Traffic Report (see Appendix H to this IS/MND), the Project would not meet these criteria at any of the studied intersections. Therefore, the Project would not have the potential to cause or contribute to an exceedance of the California one-hour or eight-hour CO standards of 20 or 9.0 parts per million (ppm), respectively; or generate an incremental increase equal to or greater than 1.0 ppm for the California one-hour CO standard, or 0.45 ppm for the eight-hour CO standard at any local intersection. Therefore, impacts with respect to localized CO concentrations would be less than significant and no mitigation

measures are required.

Toxic Air Contaminants

As the Project would consist of a multi-family residential development, it would not include any land uses that would involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants and no toxic airborne emissions would typically result from Project implementation. Additionally, construction activities associated with the Project would be typical of other development projects in the City, and would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. As is further discussed under threshold question 8.b), below, a Phase I Environmental Site Assessment for the Project determined that there are no existing hazardous spills or contamination associated with the auto repair uses nor a record of historical release; however, the dry cleaner facility has resulted in soil contamination from dry-cleaning related chemicals. Removal of the contaminated soil would comply with applicable regulations and be subject to sign-off approval from the City of Los Angeles Fire Department (LAFD) indicating that all on-site hazardous materials in the soil in the area of the existing dry cleaner facility have been suitably remediated in accordance with City and State regulatory requirements. Furthermore, to ensure air quality impacts do not result from the demolition and construction activities, the Project would comply with SCAQMD Rules 402 and 1166. Therefore, impacts associated with the release of toxic air contaminants would be less than significant and no mitigation measures are required. To ensure compliance with these applicable rules, the following regulatory compliance measure is recommended.

Regulatory Compliance Measure

RCM 3-2. In conjunction with RCM 8-1, the Project shall comply with all requirements established in SCAQMD Rule 402 (Public Nuisance) and Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil). Specifically, an approved mitigation plan must be obtained from the SCAQMD prior to the excavation or grading of soil containing VOC material including gasoline, diesel, crude oil, lubricant, waste oil, adhesive, paint, stain, solvent, resin, monomer, and/or any other material containing VOC; and/or prior to the handling or storage of VOC contaminated soil, defined as soil which registers 50 parts per million (ppm) or greater using an organic vapor analyzer (OVA) calibrated with hexane.

e) Would the project create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. A significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors. Odors are typically associated with the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes.

Construction

Potential sources that may emit odors during construction activities include equipment exhaust. Odors from these sources would be localized and generally confined to the immediate area surrounding the Project. The Project would use typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Therefore, construction of the Project would result in less than significant impacts related to odors and no mitigation measures are required.

Operation

According to SCAQMD's CEQA Air Quality Handbook, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project involves the construction and operation of a multi-family residential development, which is not typically associated with odor complaints. As the Project involves no operations related to industrial projects, no objectionable odors are anticipated. Therefore, the potential impacts associated with objectionable odors would be less than significant and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the topics listed in the air quality analysis above, including consistency with air quality plans, contributing to air pollutants, exposing sensitive receptors to air pollutants, etc. The cumulative impacts air quality study area is the Basin. As discussed under threshold question 3.c), above, a significant impact may occur if a project would add a considerable cumulative contribution to federal or State non-attainment pollutant.

Because the Basin is currently in non-attainment for O_3, PM_{10}, and $PM_{2.5}$, the Project, in combination with the related projects, could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of the Project contribution, SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed using the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that, if an individual development project generates less than significant construction or operational emissions impacts, then the development project would not contribute to a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment.

As discussed above, the mass daily construction and operational emissions generated by the Project would not exceed any of thresholds of significance recommended by SCAQMD. Also, localized emissions generated by the Project would not exceed SCAQMD's LSTs. Therefore, the Project would not contribute a cumulatively considerable increase in emissions for the pollutants which the Basin is in non-attainment. Cumulative air quality impacts would be less than significant and no mitigation measures are required.

4. BIOLOGICAL RESOURCES

a) Would the project 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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in:

- The loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern;

- The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or
- Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The Project site is fully developed with two commercial buildings and surface parking lots, and is located in a highly urbanized area of West Los Angeles. According to the *L.A. CEQA Threshold Guide*, the City encompasses a variety of open space and natural areas that serve as habitat for sensitive species. Much of this natural open space is found in or is adjacent to the foothill regions of the San Gabriel, Santa Susana, Santa Monica, and Verdugo Mountains, the Simi Hills, and along the coastline between Malibu and the Palos Verdes Peninsula. Many of the outlying areas are contiguous with larger natural areas, and may be part of significant wildlife habitats or movement corridors. The central and valley portions of the City contain fewer natural areas.[8] According to Exhibit C-4 of the *L.A. CEQA Threshold Guide*, the Project site and surrounding area are not identified as a biological resource area.[9] Moreover, the Project site and immediately surrounding area are not within or near a designated Significant Ecological Area.[10]

The Project Site does not contain any habitat capable of sustaining any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Additionally, there are no known locally designated natural communities at the Project site or in the immediate vicinity, nor is the Project Site located immediately adjacent to undeveloped natural open space or a natural water source that may otherwise serve as habitat for State- or federally-listed species. Therefore, the Project would have no impact on sensitive biological species or habitat and no mitigation measures are required.

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

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in:

- The loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern;
- The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community;
- The alteration of an existing wetland habitat; or
- Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

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[8] *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, pages C-1 – C-2.*

[9] *Ibid, Exhibit C-4, Biological Resource Areas (Coastal and Southern Geographical Area).*

[10] *Los Angeles County Department of Regional Planning, Planning & Zoning Information, GIS-NET3 online database, website: http://planning.lacounty.gov/gisnet3, accessed: January 2016.*

The Project site is fully developed with two commercial buildings and surface parking lots, and is located in a highly urbanized area of West Los Angeles. No riparian or other sensitive habitat areas are located on or adjacent to the Project site.[11] As discussed above, neither the Project site nor adjacent areas are within a biological resource area or Significant Ecological Area. Implementation of the Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities. Therefore, no impact would occur and no mitigation measures are required.

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

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in:

- The alteration of an existing wetland habitat.

The Project site is fully developed with two commercial buildings and surface parking lots areas, and is located in a highly urbanized area of West Los Angeles. Review of the National Wetlands Inventory identified no protected wetlands in the vicinity of the Project site.[12] Further, as the site is fully developed with urban uses, the Project site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act. Therefore, no impacts to riparian or wetland habitats would occur with implementation of the proposed Project and no mitigation measure are required.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in:

- Interference with wildlife movement or migration corridors that may diminish the chances for long-term survival of a sensitive species.

Due to the developed condition and location of the Project site, there are no wildlife corridors or native wildlife nursery sites in the Project vicinity. However, existing on-site trees and trees within the adjacent rights-of-way would be removed (and replaced) during construction of the Project, and these trees could contain nests for migratory birds, which are protected under the federal Migratory Bird Treaty Act (MBTA). The MBTA, which is an international treaty ratified in 1918, protects migratory nongame native bird species (as listed in 50 C.F.R. Section 10.13) and their nests. Additionally, Section 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests, including raptors and other migratory nongame birds (as listed under the MBTA). The Project would be required to comply with these existing federal and State laws, MBTA and California Fish and Game Code, respectively. Therefore, impacts would be less than significant and no mitigation measures are required.

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[11] *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, Exhibit C-4, Biological Resource Areas (Coastal and Southern Geographical Area); and U.S. Fish and Wildlife Service, National Wetlands Inventory, Wetlands Mapper, website: http://www.fws.gov/wetlands/Data/Mapper.html, accessed: January 2016.*

[12] *U.S. Fish and Wildlife Service, National Wetlands Inventory, Wetlands Mapper, website: http://www.fws.gov/wetlands/Data/Mapper.html, accessed: January 2016.*

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

Potentially Significant Unless Mitigation Incorporated. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, 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 No. 177,404.

As set forth in Ordinance No. 177,404, 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 is a protected tree:

- Oak tree including Valley Oak (*Quercus lobata*), 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*).

A tree assessment (included in Appendix B to this IS/MND) was prepared for the Project in September, 2015, to assess on-site trees in order to determine if any were native, protected species as recognized by City Ordinance No. 177,404. The tree assessment included an inventory of trees within the Project site boundaries and within the Gateway Boulevard and Colby Avenue rights-of-way. There are two on-site trees in the rear of the Project site in the area of the ancillary surface parking lot near Butler Avenue. Both of these trees are native sycamores (*Platanus racemosa*) and are healthy with very good form, and both trees have a truck diameter of 20 inches. Thus, these on-site trees are protected under Ordinance No. 177,404. As the Project would remove these protected native sycamore trees, mitigation measure MM 4-1 is required, which would also reduce potential impacts from the loss of protected trees to a less than significant level by requiring tree replacement. Therefore, with implementation of mitigation measure MM 4-1, potential impacts to local ordinances protecting biological resources would be less than significant.

There are five mature carrotwood trees (with trunks eight inches in diameter or larger at breast height) within these rights-of-way (four within Gateway Boulevard right-of-way and one within Colby Avenue right-of-way). The four trees within the Gateway Boulevard right-of-way have been poorly maintained, having been "topped," and are in poor health and poor form. The tree within the Colby Avenue right-of-way is in good health and good form. However, these street trees, which would be removed by the Project, are not protected tree species under Ordinance No. 177,404. However, as the trunks of these five carrotwood trees are eight inches in diameter or larger, they are considered by the City to be significant trees, and the loss of significant trees may result in an environmental impact. Therefore, mitigation measure MM 4-1 is required, which would reduce potential impacts from the loss of significant trees to a less than significant level by requiring tree replacement.

Mitigation Measure

MM 4-1. Removal or planting of trees in the public right-of-way and/or removal of all protected trees shall require approval by the Board of Public Works and the Advisory Agency in the course of reviewing and approving the Vesting Tentative Tract Map, and shall adhere to the following measures:

- Prior to the issuance of any permit, the required Tree Report and plot plan shall indicate the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way and shall be submitted for review and approval to the Urban Forestry Division of the Bureau of Street Services, Department of Public Works.

Regarding the Significant Street Trees:

- All significant trees (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) on the site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree.

- A Landscape Plan shall be prepared, indicating the location of all replacement trees, to the satisfaction of the decision-maker. Net, new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.

- All trees in the public right-of-way shall be provided per the current standards of the Urban Forestry Division of the Department of Public Works, Bureau of Street Services.

Regarding the Protected On-Site Trees:

- A minimum of two (2) trees (each with a minimum of 15 gallons measuring 1-inch in diameter and at least 7 feet in height measured from the base) of a protected species variety shall be planted for each protected tree that is removed. The canopy of the replacement trees, at the time they are planted, shall be in proportion to the canopies of the protected trees removed and shall be to the satisfaction of the Advisory Agency and the Urban Forestry Division.

- The location of the trees planted for the purposes of replacing a removed protected tree shall be clearly indicated on the required Landscape Plan, which shall also indicate the replacement tree species and further contain the phrase "Replacement Tree" in its description.

- The Project Applicant shall post a cash bond or other assurances acceptable to the Bureau of Engineering in consultation with the Urban Forestry Division and the decision-maker guaranteeing the survival of trees required to be maintained, replaced, or relocated in such a fashion as to assure the existence of continuously living trees for a minimum of three (3) years from the date that the bond is posted or from the date such trees are replaced or relocated, whichever is longer. Any change of ownership shall require that the new owner post a new protected tree bond to the satisfaction of the Bureau of Engineering. Subsequently, the original owner's protected tree bond may be exonerated. The City Engineer shall use the provisions of Section 17.08 as its procedural guide in satisfaction of said bond requirements and processing. Prior to exoneration of the bond, the owner of the property shall provide evidence satisfactory to the City Engineer and Urban Forestry Division that the protected trees were properly replaced, the date of the replacement, and the survival of the replacement trees for a period of three (3) years.

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

No Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact would occur if a project would be inconsistent with mapping or policies in any conservation plans of the types cited.

The Project site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Therefore, no impact would occur and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the topics listed in the biological resources analysis above, including special status species and habitat, riparian habitat and sensitive natural communities, wetlands, wildlife movement, protected trees, etc. The cumulative impacts study area for biological resources is the extent of the related projects.

As discussed above, the Project would not result in a potentially significant impact to biological resources with implementation of mitigation measure MM 4-1 for the removal of significant and protected trees. The Project site and the related projects are located in an urbanized area in the City. However, it is unknown whether or not any of the properties on which the related projects are located contain biological resources, such as sensitive species, significant trees, or protected trees. Nonetheless, as the Project would mitigate the loss of significant and protected trees through replacement, biological resource impacts would be less than significant, and as such, there is no potential for the Project to contribute to a cumulative impact and no mitigation measures are required.

5. CULTURAL RESOURCES

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

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project would disturb historic resources which presently exist within the project site. 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 which 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.

A significant adverse effect would occur if a project were to adversely affect an historical resource meeting one of the above definitions. A substantial adverse change in the significance of a historic resource means

demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

There are two buildings on the Project site currently, which are identified as being constructed in 1983 according to the records of the Los Angeles County Tax Assessor.[13] Absent special circumstances not present in this case, a site or structure must be at least 50 years of age and possess significance in American history and culture, architecture, or archaeology to be eligible for listing in either the National Register or State Register. As the existing structures are approximately 34 years of age, they are not eligible for listing as a historic resource at the national or State level. Additionally, the Project site does not require historic preservation review and is not within a historic preservation overlay zone;[14] nor is the Project site identified as an eligible resource by Survey LA, the City's official Historic Resources Survey,[15] or as a City Historic-Cultural Monument.[16] Therefore, no impact would occur and no mitigation measures are required.

b) Would the project 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. Based on the criteria in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with a project would disturb archaeological resources that presently exist within a project site. Section 15064.5 of the *State CEQA Guidelines* defines criteria for historical resources or resources that constitute unique archaeological resources. A significant impact could occur if a project would significantly affect archaeological resources that fall under either of these categories.

The Project site and immediately surrounding area do not contain any known archaeological sites or archaeological survey areas.[17] Additionally, the Project is located in a highly urbanized area of the City and has been subject to past disturbance, including the construction of the site's existing uses. Any archaeological resources that may have existed near the site surface are likely to have been disturbed or previously removed. However, the proposed Project would likely result in deeper excavations than previously performed on the site, including excavation to depths of approximately 20 feet below grade to construct the subterranean parking structure. As such, the possibility exists that deeper lying, previously unknown archeological artifacts may be present. In the event that archaeological resources are discovered during grading and excavation or construction activities, in compliance with the City's regulatory compliance measure, work would cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in Public Resources Code (PRC) Section 21083.2, as required by existing regulatory requirements. The required compliance would ensure any found deposits are treated in accordance with federal, State, and

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[13] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: January 2016.*

[14] *Ibid.*

[15] *City of Los Angeles Department of City Planning, Office of Historic Resources, Historic Places LA online map, website: http://www.historicplacesla.org/map, accessed: January 2016.*

[16] *City of Los Angeles Department of City Planning, LA Historic-Cultural Monuments, May 2015, website: http://planning.lacity.org/mapgallery/Image/Citywide/LA_HCM.pdf, accessed: January 2016.*

[17] *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-1, Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles.*

local guidelines, including those set forth in to PRC Section 21083.2. Therefore, impacts would be less than significant and no mitigation measures are required.

Regulatory Compliance Measure

RCM 5-1. If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the proposed Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. 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.

c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. A significant impact could occur if grading or excavation activities associated with a project would disturb paleontological resources or unique geologic features which presently exist within a project site.

The Project site is relatively flat, and does not contain any unique geological features. There are no known paleontological resources within the Project site.[18] The Project site and surroundings are within an area identified as having surface sediments with unknown fossils potential.[19] Additionally, the Project is located in a highly urbanized area of the City and has been subject to past disturbance, including the construction of the site's existing uses, and no paleontological resources have been identified on site or in the vicinity. However, the Project would require additional ground disturbance that may involve deeper excavation than previously performed at the site, including excavation to depths of approximately 20 feet below grade to construct the subterranean parking structure, into native soils that may contain paleontological resources. As such, the possibility exists that deeper lying, previously unknown paleontological resources may be present. Nonetheless, should paleontological resources be discovered during grading and excavation or construction activities, in accordance with the City's existing regulatory compliance measure, the City of Los Angeles Department of Building and Safety (LADBS) would be notified immediately, and all work would cease in the area of the find until a qualified paleontologist evaluates the find. The required compliance would ensure that the found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Therefore, impacts would be less than significant and no mitigation measures are required.

Regulatory Compliance Measure

RCM 5-2. 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

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[18] *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-2, Vertebrate Paleontological Resources in the City of Los Angeles.*

[19] *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-3, Invertebrate Paleontological Resource Sensitivity Areas in the City of Los Angeles.*

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.

d) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. A significant adverse impact could occur if grading or excavation activities associated with a project were to disturb previously interred human remains.

There are no known human remains within the Project site. While no formal cemeteries, other places of human internment, or burial grounds sites are known to occur within the immediate Project site area, there is always a possibility that human remains could be encountered during construction. Should human remains be encountered unexpectedly during grading or construction activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. 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 (PRC Section 5097), relating to the disposition of Native American burials would be required. Therefore, impacts would be less than significant and no mitigation measures are required. To ensure compliance with these requirements, the following regulatory compliance measure is recommended.

Regulatory Compliance Measure

RCM 5-3. If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

- Stop immediately and contact the County Coroner:
  1104 N. Mission Road
  Los Angeles, CA 90033
  323-343-0512 (8 AM to 5 PM Monday through Friday) or
  323-343-0714 (after hours, Saturday, Sunday, and holidays)

If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.

- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

Cumulative Impacts

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the topics listed in the cultural resources analysis above, including historic, archaeological, and paleontological resources, and human remains. The cumulative impacts study area for cultural resources is the extent of the related projects.

The Project site does not contain any known cultural resources and compliance with existing regulatory measures (RCM 5-1 through RCM 5-3) would ensure potential impacts from the inadvertent discovery of cultural resources would be reduced to a less than significant level. It is unknown whether or not any of the properties on which the related projects are located contain cultural resources. Any related project sites that contain historical, archaeological, or paleontological resources, or human remains would be required to comply with State regulations and/or safeguard mitigation measures. Nonetheless, as there are no known cultural resources on the Project site, there is no potential for the Project to contribute to a cumulative impact.

6. GEOLOGY AND SOILS

The following analysis is based on the findings of the Geotechnical Engineering Exploration prepared by Byer Geotechnical for the Project in August 2015 (the report is available as Appendix C to this IS/MND).

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

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if a project site is located within a State-designated Alquist-Priolo Fault Zone or other designated fault zone, and appropriate building practices are not employed.

The Project site is located in the seismically active region of Southern California. Southern California faults are classified as "active" or "potentially active." Faults from past geologic periods of mountain building that do not display evidence of recent offset are considered "potentially active." Faults that have historically produced earthquakes or show evidence of movement within the past 11,000 years are considered to be "active faults." The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazards of surface faulting and fault rupture to built structures, and Alquist-Priolo Special Studies Fault Zones have been designated by the California Geological Survey around faults that have been indicated to be active. Surface rupture generally occurs within 50 feet of an active fault line. Locally, LADBS has established Preliminary Fault Rupture Study Areas where active faults may exist and present a potential for surface ground rupture to occur during a local earthquake. These preliminary study areas are intended to act as a temporary Earthquake Fault Zone until the California Geological Survey

establishes a permanent Alquist-Priolo Earthquake Fault Zone based, in part, on the geologic investigations produced by the City.

No known active faults cross the Project site, and the Project site is not located within a currently-designated Alquist-Priolo Earthquake Fault Zone.[20] The nearest active fault to the Project site is the Santa Monica Fault, approximately one mile from the site.[21] Thus, the potential for future surface rupture on site is very low.[22] Moreover, the Project site is not within a Preliminary Fault Rupture Study Area.[23] Therefore, impacts would be less than significant and no mitigation measures are required.

(ii) Strong seismic ground shaking?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this issue, 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 locations in the Southern California region.

The Project site is located in the seismically active region of Southern California, and therefore, is susceptible to ground shaking during a seismic event. The nearest active fault to the Project site is the Santa Monica Fault, approximately one mile from the site. The Santa Monica Fault is capable of producing a maximum moment magnitude of 7.4. In addition to the Santa Monica Fault, other known active faults that could produce significant ground shaking at the Project site include Newport-Inglewood, Hollywood, Malibu Coast, and Anacapa-Dume faults.[24]

Due to the proximity of the Santa Monica Fault to the Project site and the one-second period response acceleration parameter, the Project is considered to be in Seismic Design Category E.[25] This seismic category is for structures with high seismic vulnerability near a major fault (the highest seismic risk is assigned to Seismic Design Category F). However, the Project would comply with the City Building Code, which incorporates, with local amendments, the latest editions of the International Building Code and California Building Code. Compliance with the City Building Code includes incorporation of seismic standards appropriate to the Project site and its Seismic Design Category. Modern buildings are designed to resist ground shaking through the use of shear panels, moment frames, and reinforcement in compliance with the Building Code. Additionally, the Project's geotechnical report concluded that development of the Project is feasible from a geotechnical engineering standpoint, provided the advice and recommendations contained in the report are included in the Project plans and are implemented during construction.[26] Furthermore, the Project's geotechnical report was approved by LADBS on

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[20] *Byer Geotechnical, Inc., Geotechnical Engineering Exploration, August 11, 2015, page 7. (Appendix C)*

[21] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: January 2016.*

[22] *Byer Geotechnical, Inc., Geotechnical Engineering Exploration, August 11, 2015, page 7.*

[23] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: January 2016.*

[24] *Byer Geotechnical, Inc., Geotechnical Engineering Exploration, August 11, 2015, page 7.*

[25] *Ibid., page 8.*

[26] *Ibid., page 13.*

November 24, 2015, provided the conditions contained therein are complied with during site development (the LADBS approval letter is provided in Appendix C to this IS/MND).

The Project is required, through regulatory compliance, to incorporate the recommendation of the Project's geotechnical engineer and the conditions of approval provided by LADBS, which takes into account seismic calculations from probabilistic seismic hazard modeling for the site. The geotechnical engineer's recommendations pertain to foundation design, retaining walls, temporary excavations, floor slabs, exterior concrete decks, drainage, waterproofing, plan review, site observations during construction, and construction site maintenance. The conditions of approval provided by LADBS pertain to, among others, conditions for use of fill and shoring, foundations, seismic design, and retaining walls. Therefore, as the Project would be required to comply with the City Building Code, the recommendations in the geotechnical report, and the conditions of approval provided by LADBS impacts would be less than significant.

Regulatory Compliance Measures

RCM 6-1. The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

RCM 6-2. Prior to the issuance of grading or building permits, the Applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report shall assess soil and geologic conditions at the site and include building design recommendations. The Project shall comply with the conditions contained in the approved geotechnical report and within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed Project, and as it may be subsequently amended or modified.

(iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if a project is located in an area identified as having a high risk of liquefaction and mitigation measures required within such designated areas are not incorporated into the project.

Liquefaction is a process whereby strong seismic shaking causes unconsolidated, water-saturated sediment to temporarily lose strength and behave as a fluid. The possibility of liquefaction occurring at a given site is dependent on several factors, including: anticipated intensity and duration of ground shaking; the origin, texture, and composition of shallow sediments (in general, cohesionless, fine-grained sediments such as silts or silty sands, and areas of uncompacted or poorly compacted fills are more prone to liquefaction); and the presence of shallow groundwater.

The California Geological Survey has not mapped the Project site within an area where historic occurrence of liquefaction or geological, geotechnical, and groundwater conditions indicate a potential for permanent ground displacement such that mitigation, as defined in Public Resources Code 2693(c), would be required. The Project site is approximately 250 feet to the east of a State-mapped liquefaction zone.

Additionally, the City does not identify the Project site within a liquefaction area.[27] Although not required, a liquefaction evaluation was performed on the Project site following LADBS requirements. While groundwater was encountered to an approximate depth of 59.5 feet below existing grade, for the liquefaction evaluation it was assumed the groundwater was at 40 feet below grade, which is based on the historically-highest groundwater level at the site. The liquefaction evaluation confirmed that earth material underlying the Project site are not considered susceptible to liquefaction; however, there is a 5-foot-thick soil layer at an approximate depth of 55 feet that may be susceptible to liquefaction.[28] The Project is required, through regulatory compliance measures RCM 6-1 and RCM 6-2, above, to incorporate the recommendation of the Project's geotechnical engineer and the conditions of approval provided by LADBS, which takes into account underlying soil conditions. The geotechnical engineer's recommendations pertain to foundation design, retaining walls, temporary excavations, floor slabs, exterior concrete decks, drainage, waterproofing, plan review, site observations during construction, and construction site maintenance. The conditions of approval provided by LADBS pertain to, among others, conditions for use of fill and shoring, foundations, seismic design, and retaining walls. Therefore, as the Project would be required to comply with the City Building Code, the recommendations in the geotechnical report, and the conditions of approval provided by LADBS potential impacts from seismic-related ground failure including liquefaction would be less than significant.

(iv) Landslides?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if a project is located in a hillside area with soil conditions that would suggest a high potential for sliding.

The Project site and surrounding vicinity are flat and are not located within an area identified as having a potential for landslides.[29] Furthermore, the Project site is in a densely developed area of the City and there are no known nearby landslides, nor is the Project site in the path of any known or potential landslides. Therefore, no impact would occur and no mitigation measures are required.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time.

The majority of the area surrounding the Project site is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. The Project site is currently fully developed with two commercial buildings and surface parking lot areas. Project-related grading, excavation, and construction would expose soil on site, for a limited time, resulting in possible erosion. Although there is a potential to expose soil to erosion, construction activities would be performed in accordance with the requirements of the City Building Code and the Los Angeles Regional

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[27] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: January 2016.*

[28] *Byer Geotechnical, Inc., Geotechnical Engineering Exploration, August 11, 2015, pages 10-12.*

[29] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: January 2016.*

Water Quality Control Board (LARWQCB) through the City's Stormwater Management Division. Additionally, the Project would be required to develop 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. The potential to expose soil to erosion would be further reduced through implementation of stringent controls imposed by grading and building regulations, such as the conditions of approval provided by LADBS for the Project's geotechnical report and City Building Code compliance. All grading activities would require permits from LADBS, which would include requirements to limit the potential impacts associated with erosion. In addition, on-site grading and site preparation must comply with all applicable provisions in Chapter IX, Division 70 of LAMC, which addresses grading, excavation, and fills.

Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil as the majority of the Project site would be covered by the proposed building and paving while the remaining portions of the Project site would be covered with irrigated landscaping. No exposed areas subject to erosion would be created or affected by the Project as pad and roof drainage would be collected and transferred to the street or approved location in non-erosive drainage devices. Additionally, the Project includes design features to capture and recycle on-site stormwater to reduce runoff and erosion potential. Therefore, with implementation of the applicable grading and building requirements, impacts associated with soil erosion or loss of topsoil would be less than significant.

c) Would the project 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 may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. Potential impacts with respect to liquefaction and landslide potential are evaluated under threshold questions 6(a)(iii) and (iv) above.

Fill, associated with previous site grading, underlies the Project site to a maximum observed depth of four feet. Greater depths of fill may occur locally. The fill consists of clayey sand that is medium dense with varying amounts of brick and asphalt debris. The existing fill is not suitable for support of any type of structure. However, based on the design of the Project, any fill would be removed during the excavation for the subterranean parking levels and reach the undisturbed alluvium underlying the site, which is the recommended bearing material for the Project. Thus, on-site fill would be removed and would not result in a potential impact to the operation of the Project.[30]

Safe construction practices would be exercised through required compliance with the City Building Code, the geotechnical engineer's recommendations, and conditions of approval provided by LADBS, which includes building foundation requirements appropriate to site conditions and soil conditions. Implementation of the geotechnical engineer's recommendations and the LADBS conditions of approval are required through regulatory compliance measures RCM 6-1 and RCM 6-2, above. The Project would not cause the geologic unit or soil to become unstable as a result of the proposed development, and the Project would not thereby result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, potential impacts related to geologic and soil stability would be less than significant.

[30] *Byer Geotechnical, Inc., Geotechnical Engineering Exploration, August 11, 2015, pages 5, 13.*

d) Would the project 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 may occur if a project is 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.

In addition to the existing artificial fill at the Project site discussed under threshold question 6.c), above, alluvium underlies the Project site. The upper 10 feet of alluvium consists of layers of sand and silty sand that is loose to medium dense with varying amounts of fine- to coarse-grained gravel. Alluvium between 10 and 20 feet consists of layers of silty clay and sandy silt that is medium stiff to stiff. Alluvium between 20 to 40 feet consists of layers of silty sand and sand that is medium dense. Older alluvium deposits, also known as marine deposits, underline the above-mentioned alluvium and were encountered at a depth of 40 feet below existing grade. The older alluvium consists of layers of silty sand, sandy silt, and clay that is stiff to very stiff.[31]

To ascertain the expansiveness of the soil, a swell test was performed. Based on the testing, the upper five feet of the earth materials are expected to exhibit a low expansion potential. The earth materials exposed at the lowest subterranean parking level are expected to exhibit a very low expansion potential.[32] Therefore, potential impacts from expansive soil would be less than significant and no mitigation measures are required.

e) Would the project 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. Although not specified in the *L.A. CEQA Thresholds Guide*, this question would apply to a project only if it was located in an area not served by an existing sewer system.

The Project site is located in a developed area of the City, which is served by a wastewater collection, conveyance, and treatment system operated by the City. The existing uses are connected to the City's sewer system, and septic tanks or alternative disposal systems are neither necessary nor are they proposed. The Project will connect to the City's sewer system. Therefore, no impact would occur and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the topics listed in the geology and soils analysis above, including seismicity, landslides, loss of topsoil, soil stability, fault rupture, etc. Geological hazards are site-specific and there is little, if any, cumulative relationship between a project and other nearby projects. Nonetheless, cumulative development in the Project vicinity would increase the overall population in the area, thus, increasing the potential risk of exposure to seismically-induced hazards. However, with adherence to applicable local, State, and federal regulations, building codes, comprehensive engineering practices, and site-specific design considerations, geologic hazards would be less than significant. Furthermore, the analysis of the Project's geology and soils impacts

[31] *Ibid., page 5.*

[32] *Ibid, Appendix I.*

concluded that, with implementation of mitigation measures requiring the adherence to the geotechnical engineer's recommendations and LADBS' conditions of approval, impacts would be less than significant. Therefore, cumulative impacts would be less than significant and no mitigation measures are required.

7. GREENHOUSE GAS EMISSIONS

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

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 a project is inconsistent with local and Statewide goals and policies aimed at reducing the generation of greenhouse gas (GHG) emissions.

GHGs are gases that trap heat in the atmosphere. GHGs are emitted by both natural processes and human activities. The accumulation of GHGs in the atmosphere regulates the earth's temperature. The State has undertaken initiatives designed to address the effects of GHG emissions, and to establish targets and emission reduction strategies for GHG emissions. Activities associated with the Project, including construction and operational activities, have the potential to generate GHG emissions.

The principal GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H_2O). CO_2 is the reference gas for climate change because it is the predominant GHG emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO_2 equivalents (CO_2e).

California has enacted several pieces of legislation that relate to GHG emissions and climate change, much of which sets aggressive goals for GHG reductions within the State. As required by SB 97, the California Natural Resources Agency adopted amendments to the *State CEQA Guidelines* to address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project's effects on the environment. However, neither a threshold of significance nor any specific mitigation measures are included or provided in these *State CEQA Guidelines* amendments.

Regulatory Environment

State

Assembly Bill 32 (Statewide GHG Reductions)

The California Global Warming Solutions Act of 2006, widely known as Assembly Bill (AB) 32, requires the California Air Resources Board (CARB) to develop and enforce regulations for the reporting and verification of Statewide GHG emissions. CARB is directed to set a Statewide GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

CARB's AB 32 Scoping Plan ("Scoping Plan") contains the main strategies to achieve the 2020 emissions cap. The Scoping Plan was developed by CARB with input from the Climate Action Team and proposes a comprehensive set of actions designed to reduce overall carbon emissions in California, improve the environment, reduce oil dependency, diversify energy sources, and enhance public health while creating new jobs and improving the State economy. The GHG reduction strategies contained in the Scoping Plan include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms, such as a cap-and-trade system.

CARB has adopted the first update to the Scoping Plan.[33] This update identifies the next steps for California's leadership on climate change. The first update to the initial AB 32 Scoping Plan describes progress made to meet the near-term objectives of AB 32 and defines California's climate change priorities and activities for the next several years. It also frames activities and issues facing the State as it develops an integrated framework for achieving both air quality and climate goals in California beyond 2020.

In the original Scoping Plan, CARB approved a total Statewide GHG 1990 emissions level and 2020 emissions limit of 427 million metric tons of CO_2e. As part of the update, CARB revised the 2020 Statewide limit to 431 million metric tons of CO_2e, an approximately 1 percent increase from the original estimate. The 2020 business-as-usual forecast in the update is 509 million metric tons of CO_2e. The State would need to reduce those emissions by approximately 15 percent to meet the 431 million metric tons of CO_2e 2020 limit.

Executive Order B-30-15

On April 29, 2015, Governor Edmund G. Brown Jr. issued an executive order to establish a California GHG reduction target of 40 percent below 1990 levels by 2030. This new emission reduction target of 40 percent below 1990 levels by 2030 is a step toward the ultimate goal of reducing emissions by 80 percent below 1990 levels by 2050. The executive order also specifically addresses the need for climate adaptation and directs state government to:

- Incorporate climate change impacts into the state's Five-Year Infrastructure Plan;
- Update the Safeguarding California Plan - the state climate adaption strategy - to identify how climate change will affect California infrastructure and industry and what actions the state can take to reduce the risks posed by climate change;
- Factor climate change into state agencies' planning and investment decisions; and
- Implement measures under existing agency and departmental authority to reduce GHG emissions.

California Senate Bills 1078, 107, 2, and 350 – Renewables Portfolio Standard

Established in 2002 under SB 1078 and accelerated in 2006 under SB 107, California's Renewables Portfolio Standard (RPS) requires retail suppliers of electric services to increase procurement from eligible renewable energy resources by at least 1 percent of their retail sales annually, until they reach 20 percent by 2010.

On April 2, 2011, Governor Jerry Brown signed SB 2 to increase California's RPS to 33 percent by 2020. This new standard also requires regulated sellers of electricity to procure 25 percent of their energy supply from certified renewable resources by 2016. Furthermore, Governor Brown signed SB 350 on October 7, 2015, which increases California's RPS to 50 percent by 2030.

[33] *California Air Resources Board, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014.*

Low Carbon Fuel Standard

California Executive Order S-01-07 (January 18, 2007) requires a 10 percent or greater reduction in the average carbon intensity for transportation fuels in California regulated by CARB. CARB identified the Low Carbon Fuel Standards (LCFS) as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009.

Sustainable Communities and Climate Protection Act (SB 375)

California's Sustainable Communities and Climate Protection Act, also referred to as SB 375, became effective January 1, 2009. The goal of SB 375 is to help achieve AB 32's GHG emissions reduction goals by aligning the planning processes for regional transportation, housing, and land use. SB 375 requires CARB to develop regional reduction targets for GHGs, and prompts the creation of regional plans to reduce emissions from vehicle use throughout the State. California's 18 Metropolitan Planning Organizations (MPOs) have been tasked with creating Sustainable Community Strategies in an effort to reduce the region's vehicle miles traveled (VMT) in order to help meet AB 32 targets through integrated transportation, land use, housing, and environmental planning. Pursuant to SB 375, CARB set per-capita GHG emissions reduction targets from passenger vehicles for each of the State's 18 MPOs. On September 23, 2010, CARB issued a regional 8 percent per capita reduction target for the planning year 2020, and a conditional target of 13 percent for 2035.

California Green Building Standards Code

Although not originally intended to reduce GHGs, California Code of Regulations Title 24 Part 6 (California's Energy Efficiency Standards for Residential and Nonresidential Buildings), was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. Since then, Title 24 has been amended with recognition that energy-efficient buildings that require less electricity and reduce fuel consumption in turn decrease GHG emissions. The current 2016 Title 24 standards (effective as of January 1, 2017) were revised and adopted in part to respond to the requirements of AB 32. Specifically, new development projects constructed within California after January 1, 2017, are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the California Green Building Standards (CALGreen) Code (California Code of Regulations, Title 24, Part 11).

Local Policies and Regulations

The City is addressing the issue of global climate change through implementation of the Green LA, An Action Plan to Lead the Nation in Fighting Global Warming ("Green LA Plan"), which outlines the goals and actions that the City has established to reduce the generation and emission of GHGs from public and private activities. According to the Green LA Plan, the City is committed to the goal of reducing emissions of CO_2 to 35 percent below 1990 levels by the year 2030. To achieve this goal, the City is increasing the generation of renewable energy, improving energy conservation and efficiency, and changing transportation and land use patterns to reduce dependence on automobiles.

The City adopted the CALGreen Code, with amendments, as Ordinance No. 181,480, thereby codifying provisions of CALGreen as the new Los Angeles Green Building Code. As stated in Section 99.01.101.1 of the LAMC, these regulations shall be known as the Los Angeles Green Building Code and may be cited as such. The Los Angeles Green Building Code is Article 9 of a total of 9 articles of Chapter IX of the LAMC, and adopts by reference the CALGreen Code except as amended therein. The provisions of this code shall

apply to the construction of every new building, every building alteration with a building permit valuation of $200,000 or more, and every building addition, unless otherwise indicated in this code, throughout the City. The Los Angeles Green Building Code contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. The Los Angeles Green Building Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards. Additionally, the Project is required to implement applicable energy conservation measures to reduce GHG emissions such as those described in AB 32.

Furthermore, at the regional level, SCAG's RTP/SCS is a long-range plan that is intended to improve overall mobility, reduce GHGs, and enhance the quality of life for the region's residents. SB 375 requires the RTP/SCS to reduce GHG emissions from passenger vehicles by 8 percent per capita by 2020 and 13 percent per capita by 2035 compared to 2005 levels, as set by CARB. SB 375 enhances the State's goals of AB 32. In 2016, SCAG adopted the 2016-2040 RTP/SCS which requires further reductions in GHG emissions. Implementation of SCAG's 2016-2040 RTP/SCS is expected to exceed or meet the GHG emission-reduction targets set by CARB by achieving an 8 percent reduction by 2020, 18 percent reduction by 2035, and a 21 percent reduction by 2040 compared to the 2005 level on a per capita basis. This benefit is possible largely by more sustainable planning, integrating transportation, and land use decisions to allow Southern Californians to live closer to where they work and play, and access to high-quality transit service. These features would significantly reduce VMTs. The Project's consistency with SCAG's 2016-2040 RTP/SCS is discussed under threshold question 10.b), below.

GHG Significance Threshold

The L*.A. CEQA Thresholds Guide* does not provide any guidance as to how climate change issues are to be addressed in CEQA documents. Furthermore, neither SCAQMD nor the *State CEQA Guidelines* amendments provide any adopted thresholds of significance for addressing a residential project's GHG emissions. Nonetheless, Section 15064.4 of the *State CEQA Guidelines* amendments serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City does not have an adopted quantitative threshold of significance for a residential project's generation of GHG emissions, the following analysis is based on a combination of the requirements outlined in the *State CEQA Guidelines* and a draft screening threshold previously considered by the SCAQMD.

As described in Section 15064.4(b) of the *State CEQA Guidelines*, this analysis includes an impact determination considering the following factors, among others:

> *(1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;*
>
> *(2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project;*
>
> *(3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.*

In December 2008, SCAQMD adopted an interim 10,000 metric tons CO_2e ($MTCO_2e$) per year screening level threshold for stationary source/industrial projects for which SCAQMD is the lead agency. SCAQMD continues to consider adoption of significance thresholds for non-industrial development projects. The most recent proposal issued in September 2010 uses the following tiered approach to evaluate potential GHG impacts from various uses:

Tier 1: Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.

Tier 2: Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearings and CEQA review that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.

Tier 3: Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 $MTCO_2e$/year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 $MTCO_2e$/year), commercial projects (1,400 $MTCO_2e$/year), and mixed-use projects (3,000 $MTCO_2e$/year). Under option 2 a single numerical screening threshold of 3,000 $MTCO_2e$/year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.

Tier 4: Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce Statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 $MTCO_2e$ per service population for project level analyses and 6.6 $MTCO_2e$ per service population for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

Tier 5: Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

The thresholds identified above are not adopted by SCAQMD or distributed for widespread public review and comment, and the working group tasked with developing the thresholds has not met since September 2010. The future schedule and likelihood of threshold adoption is uncertain. However, for the purpose of evaluating the GHG impacts associated with the Project, this analysis utilizes the proposed 3,000 $MTCO_2e$ per year Tier 3 threshold for non-industrial projects. These draft thresholds have been used for other projects in the Basin.

In addition and separate from the above quantitative threshold, if the Project can demonstrate qualitative consistency with applicable plans, policies and regulations adopted for the purpose of reducing the emissions of GHGs, then impacts associated with GHG emissions would be less than significant.

Construction GHG Emissions

Construction emissions represent an episodic, temporary source of GHG emissions. Emissions are generally associated with the operation of construction equipment and the disposal of construction waste. To be consistent with the guidance from SCAQMD for calculating criteria pollutants from construction activities, only GHG emissions from on-site construction activities and off-site hauling and construction worker commuting are considered to be project-generated. As explained by the California Air Pollution Controls Officers Association in its 2008 white paper, the information needed to characterize GHG emissions from manufacture, transport, and end-of-life of construction materials would be speculative at the CEQA analysis level. CEQA does not require an evaluation of speculative impacts (*State CEQA Guidelines* Section 15145). Therefore, the construction analysis does not consider such GHG

emissions, but does consider non-speculative on-site construction activities and off-site hauling and construction worker trips. All GHG emissions are calculated on an annual basis.

Emissions of GHGs were calculated using CalEEMod (version 2016.3.1) for each year of construction of the Project and the results of this analysis are presented in Table III-6, Project Construction GHG Emissions. As shown in Table III-6, the greatest annual increase in GHG emissions from Project construction activities would be 377.1 $MTCO_2e$ in 2018, and total construction GHG emissions would be 797.44 $MTCO_2e$.

Table III-6
Project Construction GHG Emissions

Year	CO_2e Emissions (Metric Tons per Year)
2018	377.10
2019	376.73
2020	43.61
Total Project Construction GHG Emissions	**797.44**

Note: Calculation data and results are provided in Appendix D to this IS/MND.
Source: Pomeroy Environmental Services, 2017.

Operational GHG Emissions

Existing Conditions

The Project site is currently developed with approximately 14,594 square feet of existing uses consisting of a dry cleaner, restaurant, automotive service facilities, and a tire store, all of which are currently operational. As such, GHG emissions are currently generated by area sources, motor vehicles, energy (electricity and natural gas), water, and generation of solid waste and wastewater. The GHG emissions generated by the existing uses at the Project site have been estimated utilizing CalEEMod (version 2013.2.2) recommended by SCAQMD. As shown in Table III-7, Existing GHG Emissions, motor vehicles are the primary source of GHG emissions associated with existing uses.

Table III-7
Existing GHG Emissions

Emissions Source	CO_2e Emissions (Metric Tons per Year)
Area	<0.01
Energy (Electricity & Natural Gas)	160.39
Mobile (Motor Vehicles)	444.70
Solid Waste Generation	33.30
Water Demand	19.50
Existing Project Site Total	**657.89**

Note: Calculation data and results provided in Appendix D to this IS/MND.
Source: Pomeroy Environmental Services, 2017.

Proposed Project

The GHG emissions resulting from operation of the Project, which involves the use of on-road motor vehicles, energy (electricity and natural gas), water, and generation of solid waste and wastewater, were calculated under the assumption of compliance with the LA Green Building Code. Emissions of operational GHGs are shown in Table III-8, Project Operational GHG Emissions. As shown, the increase in GHG emissions generated by the Project would be approximately 1,370.65 $MTCO_2e$ per year, which would be under the 3,500 $MTCO_2e$ per year threshold for residential projects under option 1 as well as under the 3,000 $MTCO_2e$/year threshold for all non-industrial projects under option 2 (see Tier 3 discussion, above).

Table III-8
Project Operational GHG Emissions

Emissions Source	CO_2e Emissions (Metric Tons per Year)
Area	30.28
Energy (Electricity & Natural Gas)	604.63
Mobile (Motor Vehicles)	1,279.49
Solid Waste Generation	29.84
Water Demand	84.30
Construction Emissions[a]	26.58
Project Total	***2,028.54***
Less Existing Project Site	*657.89*
Project Net Increase	**1,370.65**

Note: Calculation data and results provided in Appendix D to this IS/MND.

[a] *Consistent with SCAQMD recommendations, the total construction GHG emissions were amortized over 30 years and added to the operation of the Project.*

Source: Pomeroy Environmental Services, 2017.

In addition, and separate from the quantitative analysis above, there is substantial evidence to support that the Project is qualitatively consistent with Statewide, regional, and local goals and policies in place for the reduction of GHG emissions, including AB 32 and the corresponding Scoping Plan. As discussed previously, the City 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 further implement the Green LA Plan's goal of improving energy conservation and efficiency, City Council has adopted multiple ordinances and updates to establish the current Los Angeles Green Building Code. The Los Angeles Green Building Code incorporates applicable provisions of the CALGreen Code and, in some cases, outlines more strict GHG reduction measures available to development projects in the City. The Los Angeles Green Building Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by the California Energy Commission. The Scoping Plan encourages communities to adopt building codes that go beyond the State code. Accordingly, as the Los Angeles Green Building Code meets and exceeds applicable provisions of the CALGreen Code, a new development project that can demonstrate compliance with the Los Angeles Green Building Code is considered to be consistent with Statewide GHG-reduction goals and policies, including AB 32. Furthermore, the Project would also be consistent with the applicable policies and objectives of SCAG's 2012-2035 RTP/SCS, which aims to reduce VMTs in order to reduce GHG emissions, as is discussed under threshold question 10.b), below.

GHG Emissions Associated With Motor Vehicles

Motor vehicle-related GHG emissions are regulated at the federal, State and local levels. As discussed in the CARB Scoping Plan, the transportation sector – largely the cars and trucks that move goods and people – is the largest contributor with 38 percent of the State's total GHG emissions. Many of the transportation-related reduction measures identified in the Scoping Plan are focused on improving motor vehicle efficiencies through more restrictive Statewide laws and regulations. Some of these measures include Pavley I and II Standards for light-duty vehicles, LCFS, aerodynamic improvements for heavy-duty vehicles, and medium- and heavy-duty vehicle hybridizations. Together, these measures are estimated to reduce 2020 forecasted emissions by 52.60 million $MTCO_2e$. These regulatory measures are aimed at improving efficiencies of the motor vehicle fleet mix across the State and, as such, GHG emissions from future motor vehicles accessing the Project would be reduced as a result of these Statewide programs.

In addition to the Statewide improvement of motor vehicle efficiencies, it should be noted that the Project's location near transit would have the potential to reduce VMTs and associated motor vehicle related GHG emissions. The Project's Traffic Report identifies numerous public transit services within the Project area that are currently provided by the Los Angeles County Metropolitan Transportation Authority ("Metro"), the City of Santa Monica Big Blue Bus (BBB), and Culver City. The Metro Rail Expo Line is a light rail line designed to connect downtown Los Angeles with the City of Santa Monica. The Expo Line has been completed between downtown Los Angeles and Culver City, and was opened to the public in 2012. The second phase, completed in May 2016, extended the line from Culver City to downtown Santa Monica and offers seven new stations and three park-and-ride lots. The Phase 2 alignment runs adjacent to the Project site, approximately 115 feet to the north. Stations near the Project site include Exposition Boulevard and Sepulveda Boulevard (approximately 0.4 mile east of the Project site) and Exposition Boulevard and Bundy Drive (approximately 0.6 mile west of the Project site). Transfer opportunities are available to/from the Project area from the local and regional lines.

As previously discussed, SB 375 requires CARB to develop regional reduction targets for GHGs, and prompts the creation of regional plans to reduce emissions from vehicle use throughout the State. California's 18 MPOs have been tasked with creating Sustainable Communities Strategy in an effort to reduce the region's VMT in order to help meet AB 32 targets through integrated transportation, land use, housing and environmental planning. In the Project area, SCAG is the MPO that has developed a Sustainable Communities Strategy as part of its Regional Transportation Plan, referred to as the 2016-2040 RTP/SCS. The Project would be consistent with the applicable policies and objectives of SCAG's 2016-2040 RTP/SCS, which aims to reduce VMTs in order to reduce GHG emissions, as discussed under threshold question 10.b), below. Therefore, the Project's urban location and proximity to transit would be consistent with local and Statewide goals and policies aimed at reducing the generation of GHGs through integrated transportation, land use, housing and environmental planning.

Conclusion

Through compliance with the Los Angeles Green Building Code, the Project would be consistent with local and Statewide goals and policies aimed at reducing the generation of GHGs, including CARB's AB 32 Scoping Plan aimed at achieving 1990 GHG emission levels by 2020. By locating residential units within one-half mile from the Metro Rail Expo Line Exposition-Sepulveda light rail station, the Project is consistent with the transit-oriented development and VMT reduction goals and objectives of SCAG's adopted RTP/SCS. In addition, the Project's total construction and operational GHG emissions would not exceed the 3,000 $MTCO_2e$ per year screening threshold proposed by SCAQMD staff under either the Tier

3 option 1 or 2. Therefore, the Project's generation of GHG emissions would be less than significant and no mitigation measures are required.

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

No Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact would occur if a project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

As described under threshold question 7.a), above, through required compliance with the Los Angeles Green Building Code, the Project would be consistent with local and Statewide goals and policies aimed at reducing the generation of GHGs, including CARB's AB 32 Scoping Plan. Moreover, as a residential project that concentrates residential units within one-half mile from the Metro Rail Expo Line Exposition-Sepulveda light rail station, the Project furthers the transit-oriented development and VMT reduction goals and objectives outlined in SB 375 and reflected in SCAG's adopted RTP/SCS. Therefore, the Project's generation of GHG emissions would not conflict with an applicable plan, policy, or regulation for the purposes of reducing the emissions of GHGs. Therefore, no impact would occur and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Although the Project is expected to emit GHGs, the emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. As discussed in CEQA case law,[34] the global scope of climate change and the fact that CO_2 and other GHGs, once released into the atmosphere, are not contained in the local area of their emission means that the impacts to be evaluated are also global rather than local. For many air pollutants, the significance of their environmental impact may depend greatly on where they are emitted; for GHGs, it does not. For individual projects, like the proposed Project, which are designed to accommodate long-term growth in California's population and economic activity, this fact gives rise to an argument that a certain amount of GHG emissions is as inevitable with population growth. Under this view, a significance criterion framed in terms of efficiency is superior to a simple numerical threshold because CEQA is not intended as a population control measure. These considerations militate in favor of consistency with meeting AB 32's Statewide goals as a permissible significance criterion for project emissions. Meeting the Statewide reduction goals does not preclude all new development. Rather, the Scoping Plan – the State's roadmap for meeting AB 32's target – assumes continued growth and depends on increased efficiency and conservation in land use and transportation from all Californians. To the extent a project incorporates efficiency and conservation measures sufficient to contribute its portion of the overall GHG reductions necessary, it can be reasonably concluded that the project's impact is not cumulatively considerable, because it is helping to solve the cumulative problem of greenhouse gas emissions as envisioned by California law.[35]

As discussed under threshold questions 7.a) and 7.b), above, the Project's total construction and operational GHG emissions would not exceed the 3,000 $MTCO_2e$/year threshold proposed by SCAQMD

[34] *Supreme Court of California, Center for Biological Diversity et al. v. California Department of Fish and Wildlife (2015), S217763, 11-13.*

[35] *Addressing the Significance of Greenhouse Gas Emissions, supra, 4 Golden Gate U. Envtl. L.J. at p. 210.*

staff. In addition, and also detailed previously, through required implementation of the CALGreen Code and Los Angeles Green Building Code, the Project would be consistent with local and Statewide goals and policies aimed at reducing the generation of GHGs, including CARB's AB 32 Scoping Plan. As a residential transit-oriented development within close proximity to regionally-serving transit infrastructure, the Project is also consistent with the VMT reduction goals of the adopted SCAG RTP/SCS. The Project's urban location near regional transit would reduce motor vehicle-related GHG emissions compared to a project without these components. Therefore, the Project's urban location and proximity to transit would be consistent with local and Statewide goals and policies (i.e., AB 32, RTP/SCS, and SB 375) aimed at reducing the generation of GHGs through integrated transportation, land use, housing and environmental planning.

Similar to the Project, the 29 related projects identified in Section II.5, Related Projects, of this IS/MND and all future projects in the State would be reviewed for consistency with applicable State, regional, and local plans, policies, or regulations for the reduction of GHGs. Therefore, based on the discussion above, the Project's generation of GHG emissions would not be considered cumulatively considerable because of the scope of the emissions (i.e., the Project would not exceed the 3,000 $MTCO_2e$/year threshold proposed by SCAQMD staff) and because the Project would not conflict with an applicable plan, policy, or regulation for the purposes of reducing the emissions of GHGs. Therefore, the Project's cumulative impact would be less than significant and no mitigation measures are required.

8. HAZARDS AND HAZARDOUS MATERIALS

According to the *L.A. CEQA Thresholds Guide*, the determination of significance with respect to hazards and hazardous materials shall be made on a case-by-case basis considering the following factors:

- The regulatory framework for the health hazard;
- The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance;
- The degree to which the project may require a new, or interfere with an existing emergency response or evacuation plan, and the severity of the consequences;
- The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance;
- The probable frequency and severity of consequences to people from exposure to the health hazard; and
- The degree to which project design would reduce the frequency of exposure or severity of consequences to exposure to the health hazard.

The following questions are evaluated applying the foregoing methodology.

a) Would the project 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 may occur if a project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors.

Uses sensitive to hazardous emissions (i.e., sensitive receptors) in the area include the future residents of the Project, a nearby church and school, and the nearby residential land uses. The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in other residential developments (e.g., cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products). Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials area reasonably anticipated to be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be reduced through compliance with these standards and regulations. Therefore, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant and no mitigation measures are required.

b) Would the project 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 may occur if a project could potentially pose a hazard to nearby sensitive receptors by releasing hazardous materials into the environment through accident or upset conditions.

The Project would involve the demolition of the existing commercial buildings; including a dry cleaning facility and an auto repair facility, and surface parking lot areas, and the construction of 129 multi-family residential units within a 5-story structure over two levels of subterranean parking. The Project site is not located within a Methane Zone or Methane Buffer Zone.[36]

A Phase I Environmental Site Assessment (ESA) was performed by TRAK Environmental Group in January 2015 (Appendix E). The purpose of the ESA is to identify existing or potential recognized environmental conditions (RECs) affecting the Project site. An REC is the presence or likely presence or any hazardous substances or petroleum products in, on, or at the property due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment.

The ESA also categorizes RECs as controlled RECs and historical RECs. A controlled REC is an REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, and a historic REC is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls. The ESA also considered *de minimis* conditions, which are not RECs, and are conditions that generally do not present a threat to human health or the environment; as well as non-scope considerations, which are environmental issues or conditions outside the standard scope of an ESA as set forth by ASTM Standard Practice E1527-13.[37]

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[36] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: January 2016.*

[37] *TRAK Environmental Group, Phase I Environmental Site Assessment, January 8, 2015, pages 47-48. (Appendix E)*

The ESA identified evidence of an REC and historical REC in connection with the Project site, specifically associated with the existing dry cleaners facility. Evidence of a potential for environmental impairment was found in areas of the dry-cleaning machine (spills and drips/splatter on floors and lower wall surfaces, degraded vinyl floor tile) and boiler room (stains/corrosion on floor surfaces and proximity of floor drain, and deteriorated lower portions of drywall surfaces). Additionally, the ESA identified evidence of an historical REC in connection with the Project site, also associated with the existing dry cleaners facility. The historical REC is in regard to an investigation and cleanup of soils in 1999-2000. With removal of about 30 cubic yards of soil to depths of about 3.5 feet below ground surface, the regulatory authority, Los Angeles Regional Water Quality Control Board, issued a No Further Action letter dated August 17, 2000. No controlled RECs or *de minimus* conditions were observed in connection with the dry cleaners facility.

Moreover, there are six auto repair facilities on site. Auto service occupancies typically have in-ground hydraulic hoists for undercar servicing, and also aboveground lift equipment. Waste oil generated by automobile servicing is typically collected in portable carts or containers, transferred to 55-gallon drums or palletized poly containers, and transported off-site by licensed haulers for disposal. Evidence of spilled or accumulated waste oil was observed on the asphalt pavement at the rear roll-up door of Gateway Auto (11464 Gateway Boulevard). In the paved drive area between the two buildings, between Big O Tires (11470-74 Gateway Boulevard) and Kartek (11480 Gateway Boulevard), is subgrade clarifier for interception of drain-effluent from commercial occupancies, prior to discharge to sewer. Clarifier management is conducted by Patriot Environmental Services, and documentation maintained on-site, regarding manifested transport/disposal of waste. The evidence of spilled or accumulated waste oil observed on the asphalt at the roll-up door Gateway Auto was identified as a *de minimus* condition in the ESA. No RECs, controlled RECs, or historical RECs were observed in connection with the on-site auto repair facilities, and as such, no evidence of an existing or historical record of leak or contamination at the site is known to have occurred from the auto repair facilities.

Furthermore, review of regulatory databases show that there are no known hazardous sites associated with the Project site as according to California Department of Toxic Substances Control's (DTSC) EnviroStor database,[38] the State Water Resources Control Board's (SWRCB) GeoTracker database,[39] and DTSC's current "Cortese" list.[40]

As a result of the ESA's findings regarding the on-site REC associated with the dry cleaner facility and evidence of potential for environmental impairments in areas of the dry-cleaning machine and boiler room, a localized subsurface investigation was recommended. The recommended subsurface investigation was undertaken by TRAK Environmental Group in April 2015 (this report is available in Appendix F to this IS/MND). The investigation included collection and evaluation of soil and soil vapor samples at three locations, including the vicinity of the boiler room, northeast side of the dry-cleaner machine, and the northwest side of the dry-cleaner machine. Results of the soil sampling indicated that tetrachloroethene (PCE), which is a volatile organic compound, was detected in elevated concentrations

[38] *California Department of Toxic Substances Control, EnviroStor, website: http://www.envirostor.dtsc.ca.gov/public/, accessed: March 2017.*

[39] *State Water Resources Control Board, GeoTracker, website: http://geotracker.waterboards.ca.gov, accessed: March 2017.*

[40] *California Department of Toxic Substances Control, Hazardous Waste and Substances Site List (Cortese), website: http://www.envirostor.dtsc.ca.gov/public/mandated_reports.asp, accessed: March 2017.*

in all of the samples; and on the northwest side of the dry-cleaner machine, trichloroethene (TCE), which is a chlorinated-solvent breakdown compound, was detected.[41]

The incremental risk due to vapor intrusion to the on-site structure from the concentrations of PCE and TCE was evaluated. Results of the evaluation indicated an incremental risk for cancer. In accordance to DTSC Vapor Intrusion Guidance, for the site's calculated risk, further action is recommended. Such possible actions may include additional data collection, monitoring, additional risk characterization, mitigation, source remediation, and/or operational changes (i.e., ceasing the present use of PCE as a dry cleaning solvent).[42] However, as remediation of hazards is a regulatory requirement to which the Project would be required to comply, prior to the issuance of any permit, the Project Applicant shall obtain a sign-off from LAFD indicated that all on-site hazardous materials (i.e., the PCE and TCE in the soil in the area of the existing dry cleaner) have been suitably remediated in accordance with City and State regulatory requirements.

As the Project would demolish the existing commercial uses at the Project site, which includes the dry cleaner facility, the existing dry-cleaning operation and its use of PCE and TCE would cease, thereby improving the environmental conditions at the Project site by removing the existing use and preventing any further environmental impairment. Based on the proposed excavation for the two-level subterranean parking structure, soils underneath the dry cleaning facility would be entirely removed. Adherence to existing regulatory compliance measures would ensure that any contaminated soils are removed in accordance with City and State regulatory requirements prior to issuance of any permit for the Project, and thus, prior to excavation activities. Therefore, potentially significant hazardous impacts to the public or the environment through upset or accident conditions related to RECs during construction and operation of the Project would be less than significant.

Regulatory Compliance Measure

RCM 8-1. In conjunction with RCM 3-2, prior to the issuance of any use of land, grading, or building permit, the Applicant shall obtain a sign-off from the City of Los Angeles Fire Department indicating that all on-site hazardous materials, including contamination of the soil (from tetrachloroethene [PCE] and trichloroethene [TCE]), have been suitably remediated.

c) Would the project 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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact to hazards and hazardous materials if:

- A project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or
- A project involved the creation of any health hazard or potential health hazard.

Schools within a quarter-mile of the Project site include the following:

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[41] *TRAK Environmental Group, Report of Soil Vapor Investigation and Collection of Soil Samples, April 28, 2015, pages 1, 7-8. (Appendix F)*

[42] *Ibid., page 8.*

- Citizens of the World – Mar Vista, located at 11561 Gateway Boulevard approximately 325 feet southwest of the Project site;
- The City School, located at 11625 W. Pico Boulevard approximately 800 feet west of the Project site;
- Wonder Years Preschool, located at 2457 Sawtelle Boulevard approximately 916 feet east of the Project site; and
- Areté Preparatory Academy, located at 11500 W. Olympic Boulevard, Suite 318, approximately 0.2 mile northwest of the Project site.

As discussed under threshold questions 8.a) and 8.b), above, the Project would not emit or handle hazardous materials or substances other than those typical in other multi-family residential developments during operation. During construction, impacts with regards to hazardous materials would be less than significant. Therefore, the impact from the potential emission and handling of hazardous materials near a school would be less than significant and no mitigation measures are required.

d) Would the project 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 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. 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.

As part of the Phase I ESA, regulatory databases such as those required by California Government Code Section 65962.5 were reviewed for the Project site and properties within the standard search radii. The records search included federal, State, and tribal environmental record sources, and supplemental and local sources. No hazardous materials that may pose a risk at or to the Project site were listed in federal, State, tribal, supplemental, or local databases.[43] Therefore, construction and operation of the Project would not pose an environmental hazard to surrounding sensitive uses or the environment, and a less than significant impact would occur. No mitigation measures are 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 result in a safety hazard for people residing or working in the project area?

Less Than Significant Impact. A significant impact may occur if a project is located within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard.

The nearest airport to the Project site is Santa Monica Municipal Airport, located approximately 0.75 mile to the southwest in the City of Santa Monica, which operates small- to mid-sized commercial and private

[43] *TRAK Environmental Group, Phase I Environmental Site Assessment, January 8, 2015, pages 15-21.*

aircraft. However, the Project site is not located within this airport's land use plan.[44] As discussed under threshold question 8.a), above, the Project would not employ hazardous or acutely hazardous materials above those commonly used for maintenance and janitorial services associated with residential developments. The Project would use, at most, minimal amounts of hazardous materials for routine cleaning and therefore would not pose any substantial potential for accident conditions involving the release of hazardous materials. Furthermore, the Santa Monica Municipal Airport is within a highly urbanized setting with residential and commercial development completely surrounding the airport. No substantial or increased risks to life or property from airport operations would occur as a result of the Project. Therefore, impacts would be less than significant and no mitigation measures are required.

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. This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard.

The Project site is not located in the vicinity of a private airstrip. Therefore, no impact would occur and no mitigation measures are required.

g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact to hazards and hazardous materials if:

- A project involved possible interference with an emergency response plan or emergency evacuation plan.

According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- The degree to which a project may require a new, or interfere with an existing emergency response or evacuation plan, and the severity of the consequences.

There are no other critical facilities and lifeline systems in the immediate vicinity of the Project site.[45] None of the roadways that run adjacent to the Project site (Gateway Boulevard, Exposition Boulevard/Pico Boulevard, Colby Avenue, and Butler Avenue) are identified as a disaster route by either the City,[46] or by Los Angeles County.[47] Nonetheless, as discussed under threshold question 16.a), below, the Project would not result in any significant traffic impacts. Moreover, the Project would not cause permanent alterations

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[44] *Los Angeles County Airport Land Use Commission, Airport Influence Area, Santa Monica Airport, May 2003, website: http://planning.lacounty.gov/assets/upl/project/aluc_airport-santa-monica.pdf, accessed: January 2016.*

[45] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996.*

[46] *Ibid.*

[47] *Los Angeles County Department of Public Works, Disaster Route Maps, City of Los Angeles West Area, website: http://dpw.lacounty.gov/dsg/disasterroutes/map/Los%20Angeles%20West%20Area.pdf, accessed: January 2016.*

to vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way. An emergency response plan would be submitted to LAFD during review of plans as part of the standard building permit process. Furthermore, no full road closures are anticipated during construction of the Project, and none of the surrounding roadways would be impeded. Access for emergency service providers and any evacuation routes would be maintained during construction and operation. Therefore, impacts would be less than significant and no mitigation measures are required.

h) Would the project 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. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact would occur if a project site is located in proximity to wildland areas and poses a significant fire hazard, which could affect persons or structures in the areas in the event of a fire.

The Project Site is located in a highly urbanized area of West Los Angeles, and does not include wildlands or high fire hazard terrain or vegetation. The Project site is not located in a Very High Fire Hazard Severity Zone;[48] nor is the Project Site within a wildland fire hazard area.[49] Therefore, no impact from wildland fires would occur and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impacts of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the topics listed in the hazards and hazardous materials analysis above, including the transport of hazardous materials, upset and accident conditions, handling of hazardous materials, etc. The cumulative impacts study area for hazardous materials is the extent of the related projects.

Development of the Project in combination with the related projects could increase, to some degree, the risks associated with the use and potential accidental release of hazardous materials in the City. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in combination with the development proposals for each of those properties. However, the Project's impact would be less than significant and, therefore, would not substantially contribute to a cumulative impact. Furthermore, local municipalities will be required to follow local, State, and federal laws regarding hazardous materials. With compliance with local, State, and federal laws pertaining to hazardous materials, cumulative impacts to hazardous materials would be less than significant and no mitigation measures are required.

[48] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: January 2016.*

[49] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles, Adopted November 1996.*

9. HYDROLOGY AND WATER QUALITY

a) Would the project violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, 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 National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this 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 SWRCB. These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

Construction

Construction activities associated with the Project have the potential to degrade water quality through the exposure of surface runoff (primarily rainfall) to exposed soils, dust, and other debris, as well as from runoff from construction equipment. Construction associated with the Project would be subject to the requirements of LARWQCB Order No. R4-2012-0175, NPDES No. CAS004001, effective December 28, 2012, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (the "Los Angeles County MS4 Permit"), which controls the quality of runoff entering municipal storm drains in Los Angeles County. Section VI.D.8 of the Los Angeles County MS4 Permit, Development Construction Program, requires permittees (which include the City) to enforce implementation of Best Management Practices (BMPs), including, but not limited to, approval of an Erosion and Sediment Control Plan (ESCP) for all construction activities within their jurisdiction.[50] ESCPs are required to include the elements of a Stormwater Pollution Prevention Plan. Accordingly, the construction contractor for the Project would be required to implement BMPs that would meet or exceed local, State, and federal mandated guidelines for stormwater treatment to control erosion and to protect the quality of surface water runoff during the construction period. BMPs utilized could include, without limitation: disposing of waste in accordance with all applicable laws and regulations; cleaning up leaks, drips, and spills immediately; conducting street sweeping during construction activities; limiting the amount of soil exposed at any given time; covering trucks; keeping construction equipment in good working order; and installing sediment filters during construction activities. Therefore, potential impacts during construction of the Project would be less than significant and no mitigation measures are required.

Operation

With respect to water quality during operation of the Project, Los Angeles County and all incorporated cities within Los Angeles County (except the City of Long Beach) are permittees under the Los Angeles County MS4 Permit. Section VI.D.7 of the Los Angeles County MS4 Permit, Planning and Land

[50] *California Regional Water Quality Control Board – Los Angeles Region, MS4 Discharges within the Coastal Watersheds of Los Angeles County Except those Discharges Originating from the City of Long Beach MS4, Order No. R4-2012-0175, as amended by Order WQ 2015-0075, NPDES No. CAS004001, page 116 et seq.*

Development Program, is applicable to, among others, land-disturbing activities that result in the creation or addition or replacement of 5,000 square feet or more of impervious surface area on an already developed site, which would apply to the Project.[51] This Program requires, among other things, that the Project runoff volume from the following be retained on-site: (a) the 0.75 inch, 24-hour rain event; or (b) the 85th percentile, 24-hour rain event, as determined from the Los Angeles County 85th percentile precipitation isohyetal map, whichever is greater. The Project would also be subject to the BMP requirements of the SUSMP adopted by LARWQCB. As a permittee, the City is responsible for implementing the requirements of the County-wide SUSMP within its boundaries. A Project-specific SUSMP would be implemented during the operation of the Project. In compliance with the Los Angeles County MS4 Permit and SUSMP requirements, the Project would be required to retain, treat and/or filter stormwater runoff through biofiltration before it enters the City stormwater drain system. The system incorporated into the Project must follow design requirements set forth in the MS4 permit and must be approved by the City. Adherence to the requirements of the MS4 Permit and SUSMP would ensure that potential impacts associated with water quality would be less than significant. With appropriate Project design and compliance with the applicable federal, State, local regulations, and permit provisions, impacts of the Project related to stormwater runoff quality would be less than significant.

In addition, the Project would be subject to the provisions of the City's Low Impact Development (LID) Ordinance, which is designed to mitigate the impacts of increases in runoff and stormwater pollution as close to the source as possible. LID comprises a set of site design approaches and BMPs that promote the use of natural systems for infiltration, evapotranspiration and use of stormwater, as appropriate. The LID Ordinance will require the Project to incorporate LID standards and practices to encourage the beneficial use of rainwater and urban runoff, reduce stormwater runoff, promote rainwater harvesting, and provide increased groundwater recharge. In this regard, the City has established review procedures to be implemented by the Department of City Planning, LADBS, and Department of Public Works that parallel the review of the SUSMP discussed above. Incorporation of these features would minimize the increase in stormwater runoff from the Project site. The SUSMP consists of structural BMPs built into the Project for ongoing water quality purposes over the life of the Project. Additionally, because the Project site does not currently operate under a SUSMP, implementation of the Project with a SUSMP would improve water quality leaving the Project site compared to existing conditions. Therefore, impacts would be less than significant and no mitigation measures are required.

b) Would the project 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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on groundwater level if it would change potable water levels sufficiently to:

- Reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought;

[51] *Ibid., page 97 et seq.*

- Reduce yields of adjacent wells or well fields (public or private);
- Adversely change the rate or direction of flow of groundwater; or
- Result in demonstrable and sustained reduction in groundwater recharge capacity.

The Project does not involve the extraction of groundwater and it would not result in a reduction in aquifer volume or lower the local groundwater table. According to the California Geological Survey, the historically-highest groundwater level is approximately 40 feet below the ground surface in the Project area.[52] However, groundwater was encountered at the Project site at an approximate depth of 59.5 feet below existing grade during the geotechnical engineering exploration for the Project.[53] As the maximum depth of excavation for the Project is approximately 20 feet, no dewatering (i.e., removal of groundwater) during construction is anticipated.

Additionally, operation of the Project would not interfere with any groundwater recharge activities within the area. The Project site is currently developed with two commercial buildings and surface parking lot areas with very minimal areas of landscaping. Thus, the degree to which surface water infiltration and groundwater recharge currently occurs on-site is negligible. Under the Project, the amount of permeable surface area would be slightly increased comparatively. Construction and operation of the Project would not substantially affect groundwater levels beneath the Project site, including depleting groundwater supplies or resulting in a substantial net deficit in the aquifer volume or lowering of the local groundwater table. Therefore, impacts on groundwater would be less than significant, and no mitigation measures are required.

c) Would the project 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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

Construction

Construction is regulated by the City Building Code (Sections 91.7000 through 91.7016 of the LAMC). The City Building Code provides requirements for construction, grading, excavations, use of fill, and foundation work, including type of materials, design, procedures, etc., which are intended to limit the probability of occurrence and the severity of consequences from sedimentation and erosion. Necessary permits, plan checks, and inspections are specified therein. Also included in these requirements is the provision that any grading work in excess of 200 cubic yards that would occur between November 1 and April 15 (the "rainy season") must include an erosion control system approved by LADBS, which would be applicable to the Project. During Project construction, a temporary alteration of the existing on-site drainage pattern may occur. However, these changes would not result in substantial erosion or siltation due to stringent

[52] *Byer Geotechnical, Inc., Geotechnical Engineering Exploration, August 11, 2015, page 4.*

[53] *Ibid.*

controls imposed via NPDES, ESCP, LID, and SUSMP regulations, as discussed under threshold question 9.a), above.

Operation

The Project site is located in an urbanized area, and no streams or river courses are located on or immediately adjacent to the Project site. Runoff associated with the Project would be either directed in non-erosive drainage devices to landscaped areas for evaporation and/or directed to the existing City storm drain system, and thus, would not encounter exposed soils. Additionally, the Project includes operational design features to capture and retain on-site stormwater in below grade cisterns. With the development of the Project, the drainage pattern would be generally similar to the pattern at the Project site currently by conveying runoff to the City storm drain system. Thus, operation of the Project would not result in substantial erosion or siltation on- or off-site, nor would the Project result in the alteration of the course of a stream or river. Therefore, impacts would be less than significant and no mitigation measures are required.

d) Would the project 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. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

There are no streams or rivers within the Project site. Runoff associated with the Project would be either directed in non-erosive drainage devices to landscaped areas for evaporation, captured in on-site below grade cisterns, and/or directed to the existing City storm drain system and, thus, would not encounter exposed soils. The conveyance of runoff to the City storm drain system would not result in flooding on- of off-site. Therefore, impacts would be less than significant and no mitigation measures are required.

e) Would the project 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. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, 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 CWC Section 13050 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 issue, a significant impact may occur if the volume of stormwater runoff from a project were to increase to a level that exceeds the capacity of the storm drain system serving the project site. A significant adverse effect would also occur if a project would substantially increase the probability that polluted runoff would reach the storm drain system.

Runoff associated with the Project would be directed in non-erosive drainage devices to either landscaped areas for evaporation, captured and conveyed to on-site below grade cisterns, and/or directed to the existing City storm drain system. The Project would be subject to the provisions of the LID Ordinance. In this regard, the City has established review procedures to be implemented by the Department of City Planning, LADBS, and Department of Public Works that expand the review of the SUSMP discussed above.

Incorporation of these features would minimize the stormwater runoff from the Project site. It can be reasonably anticipated, then, that the existing storm drain system has adequate capacity to accommodate flows from the Project site. Therefore, impacts would be less than significant and no mitigation measures are required.

f) Would the project otherwise substantially degrade water quality?

Less Than Significant Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project includes sources of water pollutants that would have the potential to substantially degrade water quality.

As described under threshold questions 9.a) and 9.e), above, with implementation of regulatory requirements, water quality impacts associated with construction and operation of the Project would be less than significant. No mitigation measures are required.

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

No Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact would occur if a project were to place housing within a 100-year flood hazard area. A 100-year flood is defined as a flood which results from a severe rainstorm with a probability of occurring approximately once every 100 years.

According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map, the Project site is within Zone X – Other Areas, which is a designation for areas determined to be outside the 0.2 percent annual chance floodplain.[54] Thus, the Project site is not within a 100-year flood hazard area. Therefore, no impact would occur and no mitigation measures are required.

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project was located within a 100-year flood zone, which would impede or redirect flood flows.

As discussed under threshold question 9.g), above, FEMA's Flood Insurance Rate Map shows the Project site is not within a 100-year flood hazard area. Therefore, no impact would occur and no mitigation measures are required.

i) Would the project 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?

Less Than Significant Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, 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.

[54] *Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California, FIRM Panel 06037C1590F, website: http://msc.fema.gov/portal, accessed: January 2016.*

The Project site is located within a potential inundation area in the event the dam at the Stone Canyon Reservoir in the Santa Monica Mountains were to fail.[55] The Stone Canyon Reservoir is located approximately five miles north of the Project site, and is owned by the City of Los Angeles Department of Water and Power.

For purposes of conservatively mapping a dam failure inundation area, the water level contained by each dam is assumed to be the peak storage capacity, and the failure is assumed to be catastrophic (i.e., instantaneous). The greatest hazard is closest to the dam where the flood waters would have the greatest volume (and depth) and velocity which causes direct impact to structures, flooding, and severe erosion. Some property damage and injury could be caused at much greater distances due to collateral considerations (e.g., vehicle accidents, electrical shock). The State Division of Safety of Dams regulates the siting, design, construction, and periodic review of all dams in the State. Dam safety regulations and flood plain ordinances are the main means of mitigating damage or injury due to dam failure inundation; dam failure inundation has a relatively low probability of occurrence.[56]

Inspection and monitoring programs for the Stone Canyon Reservoir would provide considerable forewarning of any overtopping threat and provide adequate warning to evacuate areas in immediate danger. Additionally, considering the construction of the Stone Canyon Reservoir's dam, the primary threat of dam failure would be the result of an earthquake. The Stone Canyon Reservoir's dam is constructed of concrete, and there are no historical examples of concrete dam failures during an earthquake event. Thus, with also considering the distance of the Project site from the Stone Canyon Reservoir (five miles), the potential risk of inundation from failure of the Stone Canyon Reservoir's dam resulting in loss of life, injury, or death at the Project site is very low. Therefore, impacts would be less than significant and no mitigation measures are required.

j) Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

No Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami), or if a project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows.

The Project site is located approximately 3.6 miles from the Pacific Ocean, and is not within an area potentially impacted by a tsunami.[57] There are also no major water bodies in the vicinity of the Project site that would put the site at risk of inundation by seiche. Furthermore, the Project site is located within a developed area where little open space exists. The Project site is relatively flat and is not located adjacent to a hillside area and, thus, the potential for mudflows to impact the Project site would be highly unlikely. Therefore, no impacts with respect to the risk of loss, injury, or death by seiche, tsunami, or mudflow would occur and no mitigation measures are required.

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[55] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas in the City of Los Angeles, Adopted November 1996.*

[56] *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Section 2.17, Geologic/Seismic Conditions, pages 2.17-38, 2.17-40, 2.17-61 – 2.17-62.*

[57] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas in the City of Los Angeles, Adopted November 1996.*

Cumulative Impacts

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the topics listed in the hydrology and water quality analysis above. The cumulative impacts study area for hydrology and water quality is the extent of the related projects.

With respect to construction impacts, it is unknown whether or not any of the related projects would have overlapping construction schedules with the Project. However, similar to the Project, the related projects would be required to comply with the City Building Code, NPDES requirements, etc. Assuming compliance, similar to the Project, the cumulative water quality impact during construction would be less than significant.

With respect to operational impacts, development of the Project in combination with the related projects would result in the further infilling in an already developed area. As discussed above, the Project site and the surrounding area are served by the existing City storm drain system. Runoff from the Project site and the adjacent land uses is typically directed into the adjacent streets, where it flows to the drainage system. It is likely that most, if not all, of the related projects would also drain to the surrounding street system or otherwise retain stormwater on-site.

The runoff associated with the related projects would either be directed in non-erosive drainage devices to landscaped areas or directed to an existing storm drain system and would not encounter exposed soils. The related projects would include a drainage system with pipes that would adequately convey surface water runoff into the existing storm drain or the on-site cisterns. Additionally, all of the related projects would be required to implement BMPs and to conform to the existing NPDES water quality program. Therefore, cumulative hydrology, water quality, and flooding impacts during operation would be less than significant.

10. LAND USE AND PLANNING

a) Would the project physically divide an established community?

No Impact. A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community). According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- The extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area;
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed project.

The Project site is currently developed with two commercial buildings and surface parking lot areas. The Project would involve the demolition of the existing uses and construction of a multi-family residential building with 129 dwelling units over 2 levels of subterranean parking. The Project site is relatively flat

and is immediately surrounded by commercial and residential land uses in an urban setting that is similar to other areas in West Los Angeles.

The Project would not cause any permanent street closures or block access to any surrounding land use. Since the Project would be developed within a long-established developed area along an existing street grid system, the Project would not physically divide an established community by creating new streets or by blocking or changing the existing street grid pattern.

The Project's entitlements include the vacation of an existing alley that currently bisects the site. This alley has been utilized exclusively by the existing commercial uses for more than 30 years, and is physically gated for vehicular access to or from the adjacent residential uses to the east and south. As the alley is completely interior to the existing Project site and does not actively serve as circulation for an existing community, the vacation and merger of the alley into the property would not divide an established community, but would instead unify the Project site and allow productive use of the parcels for development of market rate and affordable housing units. The Project would provide an on-site hammerhead/turn around area in the event that vehicular access is ever required. Thus, the Project would not expand the property into the surrounding neighborhood or otherwise divide the surrounding community, nor would the Project introduce any physical barriers to the community. Therefore, no impact would occur and no mitigation measures are required.

b) Would the project 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. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site;
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

The Project site is subject to the applicable policies and zoning requirements of several regional and local plans. At the regional/subregional level, development within the Project site is subject to SCAG's 2008 Regional Comprehensive Plan (RCP) and 2016-2040 RTP/SCS, SCAQMD's 2012 AQMP, and Metro's 2010 Congestion Management Program for Los Angeles County (CMP). At the City level, development within the Project site is subject to the City of Los Angeles General Plan, the Palms-Mar Vista-Del Rey Community Plan, West Pico Boulevard CDO, West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP), and the LAMC, particularly the Planning and Zoning Code. The Project site is also subject to the Department of City Planning's Walkability Checklist. An overview of each of these plans and regulations is provided below. However, not every policy or goal of these plans is intended to mitigate or avoid environmental impacts. Where a policy is not intended to mitigate or avoid an environmental impact, consistency with that policy may not be relevant to an environmental impact analysis.

Southern California Association of Governments

The goals and policies in the SCAG plans only address projects considered to be regionally significant. SCAG reviews projects and plans throughout its jurisdiction to monitor regional development. In the Southern California region, SCAG acts as the region's "clearinghouse" and collects information on projects of varying size and scope to provide a central point to monitor regional activity. The Project is not considered to be a regionally significant project. As such, the Project is not required to demonstrate consistency with SCAG policies contained in the RCP and RTP/SCS. Nonetheless, consistency with these plans are discussed below.

Regional Comprehensive Plan

The Project would be consistent with to the goals in the RCP, including goals related to land use. Table III-9, Project Consistency with the Applicable Goals of the RCP, presents an analysis of the Project's consistency with those goals.

Table III-9
Project Consistency with the Applicable Goals of the RCP

Goal[a]	Project Consistency
Focusing growth in existing and emerging centers and along major transportation corridors.	**Consistent.** The Project proposes multi-family residential including ground-floor "live/work" residential units along Gateway Boulevard in an area of the Project site is served by several bus lines. Additionally, the Project site is located approximately one-half mile from two future Metro Rail Expo Line stations.
Creating significant areas of mixed-use development and walkable, "people-scaled" communities.	**Consistent.** The Project site is located in an area of West Los Angeles that is currently considered to be walkable and "people-scaled." Pico Boulevard near the Project site has sidewalk cafés and retail store fronts; features which are all considered to be "people-scaled." The Project would further this goal by placing a multi-family residential project near the corner of Gateway Boulevard and Exposition Boulevard/Pico Boulevard including ground-floor "live/work" residential units along Gateway Boulevard within this "people-scaled" community.
Targeting growth in housing, employment, and commercial development within walking distance of existing and planned transit stations.	**Consistent.** The area of the Project site is served by several bus lines. Additionally, the Project site is located approximately one-half mile from two Metro Rail Expo Line stations. The Project would develop residential uses within walking distance of bus lines and light rail transit stations.
Injecting new life into under-used areas by creating vibrant new business districts, redeveloping old buildings and building new businesses and housing on vacant lots.	**Consistent.** The Project proposes multi-family residential building including ground-floor "live/work" residential units along Gateway Boulevard on a property that is under-utilized for its location in a dense urban area with primarily automotive service facilities and surface parking lot areas. The Project would also help to revitalize the area that is now along a light rail transit corridor.
Protecting important open space, environmentally sensitive areas and agricultural lands from development.	**Consistent.** The Project would not remove important open space, environmentally sensitive areas, or agricultural lands.

[a] *Southern California Association of Governments, 2008 Regional Comprehensive Plan, Adopted October 2008.*
Source (table): EcoTierra Consulting, 2016.

Regional Transportation Plan / Sustainable Communities Strategy

Federal guidelines require that all new regionally significant transportation projects be included in a regional transportation plan before they can receive federal or State funds or approvals. Metro submits the program of Los Angeles County projects for inclusion in the Regional Transportation Improvement Program. Federal approval requires a positive demonstration that the regional transportation plan projects would not generate travel emissions that exceed those assumed in the applicable AQMP; this requirement is known as "transportation conformity."

SCAG adopted the 2016-2040 RTP/SCS on April 7, 2016. The RTP/SCS is a long-range plan that is intended to improve overall mobility, reduce GHGs and enhance the quality of life for the region's residents. The RTP/SCS includes goals and policies applicable to transportation and, in some cases, land use projects.

The consistency of the Project with the RTP/SCS is addressed in Table III-10, Project Consistency with the Applicable Goals of the RTP/SCS. As shown, the Project would be consistent with the applicable goals in the RTP/SCS.

Table III-10
Project Consistency with the Applicable Goals of the RTP/SCS

Goal[a]	Project Consistency
Maximize mobility and accessibility for all people and goods in the region.	**Consistent.** The area of the Project site is served by several bus lines. Additionally, the Project site is located approximately one-half mile from two Metro Rail Expo Line stations. The Project would develop residential uses, including both market rate and 15 Very Low Income household units, within walking distance of existing bus lines and light rail transit stations. The Project would also provide long-term and short-term bicycle parking.
Ensure travel safety and reliability for all people and goods in the region.	**Consistent.** The Project site is located in proximity to public transit opportunities, which provide safe and reliable travel options for people and goods. The Project would also provide long-term and short-term bicycle parking.
Maximize the productivity of our transportation system.	**Consistent.** The Proposed is located in a dense urban area, and would be a greater intensity than what currently exists on the Project site. The area of the Project site is served by several bus lines, including rapid service. Additionally, the Project site is located approximately one-half mile from two Metro Rail Expo Line stations. The Project would develop residential uses within walking distance of existing bus lines and light rail transit stations, and would also provide long-term and short-term bicycle parking. The Project would provide opportunities for residents and visitors to use public transit for work trips, and walk to retail businesses near the Project site.
Protect the environment and health of our residents by improving air quality, and encouraging active transportation (bicycling and walking).	**Consistent.** The Project would provide a total of approximately 146 bicycle parking spaces in excess of the number of spaces required by the LAMC. Pedestrian access to the Project site would be provided via the sidewalks along Gateway Boulevard and Exposition Boulevard/Pico Boulevard. The Project would provide opportunities for residents and visitors to walk to retail businesses near the Project site.

Table III-10
Project Consistency with the Applicable Goals of the RTP/SCS

Goal[a]	Project Consistency
Encourage land use and growth patterns that facilitate transit and active transportation.	**Consistent.** The area of the Project site is served by several bus lines, including rapid service. Additionally, the Project site is located approximately one-half mile from two Metro Rail Expo Line stations. The Project would develop residential uses within walking distance of existing bus lines and light rail transit stations. The Project would also provide a total of 146 bicycle parking spaces. Pedestrian access to the Project site would be provided via the sidewalk along Gateway Boulevard and Exposition Boulevard/Pico Boulevard. The Project would include ground-floor "live/work" residential units along Gateway Boulevard with stoops and direct entryways from the street further activating the primary building frontage and encouraging pedestrian activity. The Project would provide opportunities for residents and visitors to use public transit for work trips, and walk to retail businesses near the Project site.

[a] *Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Adopted April 2016.*
Source (table): EcoTierra Consulting, 2016.

South Coast Air Quality Management District

The Project site is located within the Basin and is, therefore, within the jurisdiction of SCAQMD. In conjunction with SCAG, SCAQMD is responsible for formulating and implementing air pollution control strategies. It has responded to this requirement by preparing a series of AQMPs. The most recent of these was adopted by the Governing Board of SCAQMD on December 7, 2012. This AQMP, referred to as the 2012 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. The 2012 AQMP identifies the control measures that will be implemented over a 20-year horizon to reduce major sources of pollutants. Implementation of control measures established in the previous AQMPs has substantially decreased the population's exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Basin. Project consistency with the AQMP are analyzed under threshold question 3.a), above.

Los Angeles County

Congestion Management Program

Within Los Angeles County, Metro is the designated congestion management agency responsible for coordinating regional transportation policies. The CMP was developed in accordance with Section 65089 of the California Government Code. The CMP is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. Furthermore, the program seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel and to propose transportation projects, which are eligible to compete for State gas tax funds. To receive funds from Proposition 111 (i.e., State gasoline taxes designated for transportation improvements) cities, counties, and other eligible agencies must implement the

requirements of the CMP. The Project's traffic analysis, which is discussed in greater detail under threshold question 16.a), below, was prepared in accordance with the CMP and City of Los Angeles Department of Transportation (LADOT) guidelines. See the discussion under threshold question 16.b), below, for Project impacts to the CMP.

City of Los Angeles

City of Los Angeles General Plan

Land uses on the Project site are guided by the General Plan. The General Plan sets forth goals, objectives, and programs to provide a guideline for day-to-day land use policies and to meet the existing and future needs and desires of the community, while integrating a range of State-mandated elements including Land Use, Transportation, Noise, Safety, Housing, and Open Space/Conservation. The Land Use Element of the General Plan consists of the General Plan Framework Element, which addresses Citywide policies, and also includes the 35 community plans that guide land use at a local level.

City of Los Angeles General Plan Framework Element

The consistency of the Project with applicable objectives and policies in the General Plan Framework Element is presented in Table III-11, Consistency with the Applicable Objectives and Policies of the Framework Element. As shown, the Project would be consistent with the applicable objectives and policies in the General Plan Framework Element.

Table III-11
Consistency with the Applicable Objectives and Policies of the Framework Element

Objective/Policy[a]	Project Consistency
Land Use Chapter	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	**Consistent.** The Project would develop a multi-family residential project including ground-floor "live/work" residential units along Gateway Boulevard in the dense urban area of West Los Angeles. The Project would contribute to the diversity of land uses in the area, which currently includes commercial, retail, restaurant, residential, and other land uses.
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.	**Consistent.** The area of the Project site is served by several bus lines, including rapid service. Additionally, the Project site is located approximately one-half mile from two Metro Rail Expo Line stations. The Project would develop residential uses within walking distance of existing bus lines and light rail transit stations. The Project would include ground-floor "live/work" residential units along Gateway Boulevard with stoops and direct entryways from the street further activating the primary building frontage and encouraging pedestrian activity. The Project would provide opportunities for residents and visitors to use public transit for work trips, and walk to retail businesses near the Project site. The Project would also provide long-term and short-term bicycle parking. As such, the Project would support the reduction of vehicle trips, vehicle miles travelled, and air pollution.

Table III-11
Consistency with the Applicable Objectives and Policies of the Framework Element

Objective/Policy[a]	Project Consistency
Policy 3.2.1: Provide a pattern of development consisting of distinct districts, centers, boulevards, and neighborhoods that are differentiated by their functional role, scale, and character. This shall be accomplished by considering factors such as the existing concentrations of use, community-oriented activity centers that currently or potentially service adjacent neighborhoods, and existing or potential public transit corridors and stations.	**Consistent.** The Project would include the development of multi-family residential uses including ground-floor "live/work" residential units along Gateway Boulevard. As such, the Project would support the currently active neighborhood/corridor along Pico Boulevard, and would also help to revitalize the area that is now along a light rail transit corridor.
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**Consistent.** The Project would provide a total of 146 bicycle parking spaces mixed between long- and short-term stalls. Pedestrian access to the Project site would be provided via the sidewalks along Gateway Boulevard, Exposition Boulevard/Pico Boulevard. The Project would include ground-floor "live/work" residential units along Gateway Boulevard with stoops and direct entryways from the street further activating the primary building frontage and encouraging pedestrian activity. The Project would provide opportunities for residents and visitors to use public transit for work trips, and walk to retail businesses near the Project site.
Policy 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.	**Consistent.** The Project would enhance the character of an existing area by providing multi-family residential use including ground-floor "live/work" residential units along Gateway Boulevard in the dense urban area of West Los Angeles. The Project would comply with the West Pico Boulevard CDO pedestrian-oriented design guidelines.
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.	**Consistent.** The Project would provide new multi-family residential development including "live/work" residential units that is consistent with existing land uses in the Palms-Mar Vista-Del Rey Community Plan Area, which includes a mix of commercial, residential, and office land uses. The Project would not encroach upon or cause the removal or relocation of land uses in existing neighborhoods or districts. The Project would also help to revitalize the area that is now along a light rail transit corridor.
Objective 3.17: Maintain significant and architectural districts while allowing for development of economically viable uses.	**Consistent.** As further discussed under threshold question 5.a), above, the Project would have a less than significant impact on historic resources and would contribute residential vitality and architectural significance to an underutilized site.
Urban Form and Neighborhood Design Chapter	
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.	**Consistent.** The area of the Project site is served by several bus lines. Additionally, the Project site is located approximately one-half mile from two Metro Rail Expo Line stations. The Project would also help to revitalize the area that is now along a light rail transit corridor.

Table III-11
Consistency with the Applicable Objectives and Policies of the Framework Element

Objective/Policy[a]	Project Consistency
Policy 5.2.2: Encourage the development of centers, districts, and selected corridor/boulevard nodes such that the land uses, scale, and built form allowed and/or encouraged within these areas allow them to function as centers and support transit use, both in daytime and nighttime.	**Consistent.** The Project's proposed land uses would be consistent with the existing surrounding land uses. The Project would provide multi-family residential uses including "live/work" residential units in the dense urban area of West Los Angeles. Project buildout would also be of a scale that is appropriate in West Los Angeles and its location along at a major intersection. The Project would be developed in accordance with the West Pico Boulevard CDO. As previously discussed, the land uses would support transit use.
Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.	**Consistent.** The Project site is located in an area of West Los Angeles that is currently considered to be walkable. The nearby portion of Pico Boulevard where the Project site is located has restaurants and retail store fronts, all of which serve as a focus of activity for the community. The Project would also further this objective by placing multi-family residential uses near the corner of Gateway Boulevard and Exposition Boulevard/Pico Boulevard and include ground-floor "live/work" residential units along Gateway Boulevard in this pedestrian-oriented area with stoops and direct entryways from the street. The Project would comply with and advance the CDO's pedestrian-oriented design goals and objectives.
Policy 5.8.1: Buildings in pedestrian-oriented districts and centers should have the following general characteristics: a. An exterior building wall high enough to define the street, create a sense of enclosure, and typically located along the sidewalk; b. A building wall more-or-less continuous along the street frontage; c. Ground floor building frontage designed to accommodate commercial uses, community facilities, or display cases; d. Shops with entrances directly accessible from the sidewalk and located at frequent intervals; e. Well lit exteriors fronting on the sidewalk that provide safety and comfort commensurate with the intended nighttime use, when appropriate; f. Ground floor building walls devoted to display windows or display cases; g. Parking located behind the commercial frontage and screened from view and driveways located on side streets where feasible; h. Inclusion of bicycle parking areas and facilities to reduce the need for vehicular use; and i. The area within 15 feet of the sidewalk may be an arcade that is substantially open to the	**Consistent.** The Project would include many of the design characteristics listed in this policy. The ground floor would be easily accessible to pedestrians along Gateway Boulevard, Exposition Boulevard/Pico Boulevard, and pedestrian activity would be encouraged through the provision of ground-floor "live/work" residential units along Gateway Boulevard. The Project would also provide a total of 146 bicycle parking spaces. Overall, the Project would comply with the West Pico Boulevard CDO pedestrian-oriented design guidelines.

Table III-11
Consistency with the Applicable Objectives and Policies of the Framework Element

Objective/Policy[a]	Project Consistency
sidewalk to accommodate outdoor dining or other activities.	

[a] City of Los Angeles, Citywide General Plan Framework Element, readopted August 2001.
Source (table): EcoTierra Consulting, 2016.

Palms-Mar Vista-Del Rey Community Plan

The community plans are intended to promote an arrangement of land uses, streets, and services, which would encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The community plans are also intended to guide development in order to create a healthful and pleasing environment. The community plans coordinate development among the various communities of the City and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community. The Palms-Mar Vista-Del Rey Community Plan guides land uses on the Project site and in the surrounding areas. The current plan sets forth planning goals and objectives to maintain the community's distinctive character.

As shown in Figure III-1, Community Plan Land Use Designations, the Palms-Mar Vista-Del Rey Community Plan designates the Project site as General Commercial. The Project would be consistent with this land use designation as the Project's residential land use is allowed in the General Commercial land use designation. With approval of requested FAR increase of 35 percent, which is an on-menu incentive part of the City's Density Bonus to which the Project is eligible for providing 15 percent of its base density for Very Low Income households, the Project's FAR would be consistent with the Community Plan land use designation.

The Project's consistency with the applicable policies of the Palms-Mar Vista-Del Rey Community Plan is presented in Table III-12, Consistency with the Applicable Policies of the Community Plan. As shown, the Project would be consistent with the applicable policies in the Palms-Mar Vista-Del Rey Community Plan.

Table III-12
Consistency with the Applicable Policies of the Community Plan

Policy[a]	Project Consistency
1-1.1. Provide for adequate multi-family residential development.	**Consistent.** The Project would include approximately 129 multi-family residential units including 15 units set aside for Very Low Income households.
1-1.2. Protect the quality of residential environment and the appearance of communities with attention to site and building design.	**Consistent.** The Project would be visually integrated with the existing scale and grain of the existing neighborhood while contributing to a major intersection. The proposed building would be reflective of the expected visual character of this area, particularly as envisioned by the West Pico Boulevard CDO for the area's revitalization.
1-1.3. Protect existing single-family residential neighborhoods from new out-of-scale development and other incompatible uses.	**Consistent.** The Project has been carefully designed to respect the lower-density residential neighborhood to the south of the Project site by designing the Project to be concentrated along street fronts. The rear residentially-zoned portion of the Project site that is adjacent to R1 single-family residential zoning has been designed to be fully compliant with LAMC transitional height requirements and uses landscaping and open space to

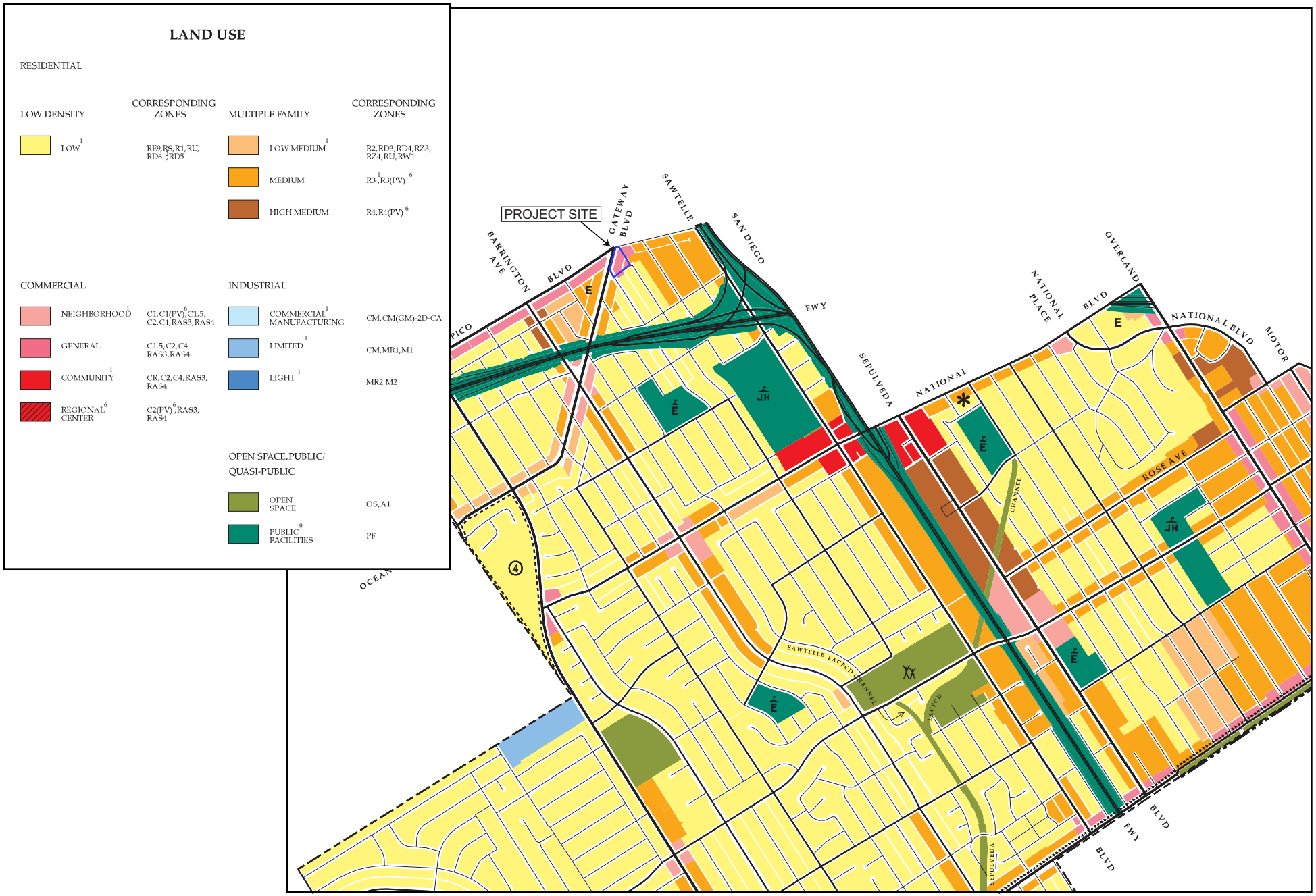
Table III-12
Consistency with the Applicable Policies of the Community Plan

Policy[a]	Project Consistency
	provide additional buffering and separation from the R1-zoned properties. Gateway Boulevard is more suitable for higher-density development.
1-2.1. Locate higher residential densities near commercial centers and major bus routes where public service facilities and infrastructure will support this development.	**Consistent.** The Project would include 129 multi-family residential units at a major intersection and along a light rail transit corridor. Sufficient public infrastructure and services exist to serve the Project. The area of the Project site is served by several bus lines, including rapid service, and is approximately one-half mile from two Metro Rail Expo Line station stops.
1-4.1. Promote greater individual choice in type, quality, price and location of housing.	**Consistent.** The Project would include 129 multi-family residential units including 15 units set aside for Very Low Income households. The Project's residential units would consist of studio, one-bedroom, and two-bedroom units. As such, the Project includes a variety of housing types at different price points.
1-4.2. Ensure that new housing opportunities minimize displacement of residents.	**Consistent.** The Project site is currently developed with commercial uses and surface parking lot areas. No residents would be displaced.
2-2.1. Encourage Pedestrian-oriented design in designated areas and in new development.	**Consistent.** The Project creates a vibrant community and pedestrian-oriented streetscape along a primary transit corridor and similar uses. The façade of the Project is designed with varying materials and treatments to create a unique street frontage while maintaining the pedestrian experience at street level with high ground floor façade transparency. Sidewalks and landscaping would front the Project. The Project also includes ground-floor "live/work" residential units along Gateway Boulevard with stoops and direct entryways from the street to encourage pedestrian activity. Furthermore, the Project would be in compliance with West Pico Boulevard CDO by providing a building that would enhance the appearance of the area (as discussed in more detail below) and revitalize the area.
2-2.2. Require that mixed-use projects and development in pedestrian oriented areas are developed according to specific design guidelines to achieve a distinctive character and compatibility with surrounding uses.	**Consistent.** The Project creates a vibrant community and pedestrian-oriented streetscape along a primary transit corridor and similar uses. The façade of the Project is designed with varying materials and treatments to create a unique street frontage while maintaining the pedestrian experience at street level with high ground floor façade transparency. Sidewalks and landscaping would front the Project. The Project also includes ground-floor "live/work" residential units along Gateway Boulevard with stoops and direct entryways from the street to encourage pedestrian activity. Furthermore, the Project would be in compliance with West Pico Boulevard CDO by providing a building that would enhance the appearance of the area (as discussed in more detail below) and revitalize the area.
2-3.1. Require that the design of new development be compatible with adjacent development, community character and scale.	**Consistent.** The Project's proposed land uses would be consistent with the existing surrounding land uses and the scale and grain of the existing neighborhood. The Project

Table III-12
Consistency with the Applicable Policies of the Community Plan

Policy[a]	Project Consistency
	design sites the bulk of the proposed building on the C2 commercially-zoned portion and utilizes the majority of the R3 residentially-zoned portion for landscaping, open space, and two-story townhome-type units. The rear portion of the Project site would be fully compliant with LAMC requirements for transitional heights that account for the off-site R1 single-family residential zoning. The Project would provide multi-family residential use including ground-floor "live/work" residential units along Gateway Boulevard in the dense urban area at a major intersection. The Project would also help to revitalize the area that is now along a light rail transit corridor.
2-3.2. Establish commercial areas and street identity and character through appropriate sign control, landscaping and streetscape.	**Consistent.** The Project would include way-finding and identification signs. Landscaping would be provided along Gateway Boulevard and Colby Avenue fronting the Project site.

[a] *City of Los Angeles Department of City Planning, Palms-Mar Vista-Del Rey Community Plan, Adopted September 1997.*
Source (table): EcoTierra Consulting, 2016.



Source: City of Los Angeles Department of City Planning, November 2012.

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Figure III-1
Community Plan Land Use Designations

West Los Angeles Transportation Improvement and Mitigation Specific Plan

The Project Site is located WLA TIMP, which was adopted on March 8, 1997, with the intent to:

1. Provide a mechanism to fund specific transportation improvements due to transportation impacts generated by the projected new development within the WLA TIMP Area;
2. Establish the Transportation Impact Assessment Fee process for new development in the C, M and P zones;
3. Require that new development mitigate Significant Transportation Impacts caused by development in the R-3 and less restrictive zones;
4. Regulate the phased development of land uses, insofar as the transportation infrastructure can accommodate such uses;
5. Establish a WLA TIMP Area infrastructure implementation process;
6. Promote area wide transit enhancement through additional transit lines, shuttles, transit centers and facilities which expedite transit flow;
7. Promote or increase work-related ridesharing and bicycling to reduce peak-hour Trips and to keep critical intersections from severe overload;
8. Prevent Peak Hour LOS on streets and intersections from reaching LOS "F" or, if presently at LOS "F" preclude further deterioration in the LOS;
9. Promote neighborhood protection programs to minimize intrusion of commuter traffic through residential neighborhoods;
10. Promote the development of coordinated and comprehensive transportation plans and programs with other jurisdictions and public agencies;
11. Ensure that the public transportation facilities that will be constructed with funds generated by the WLA TIMP will significantly benefit the contributor; and
12. Encourage Caltrans to widen the San Diego Freeway for high occupancy vehicle lanes.

As further discussed under threshold question 16.a), the Project would generate a net increase of 455 daily trips, including 24 AM peak hour trips and 12 PM peak hour trips. As required under Section 4.E.1 of the WLA TIMP, the Project would include applicable highway dedications and improvements as required by LADOT or guarantee them pursuant to the Department of Public Work's B-permit procedures. As required under Section 4.E.2 of the WLA TIMP, a traffic assessment has been prepared for the Project, which is discussed further under the Transportation/Traffic subheading and available as Appendix H to this IS/MND. As discussed under threshold question 16.a), below, the Project would not result in significant impacts to roadway circulation performance. The Project would comply with the WLA TIMP.

Planning and Zoning Code

All on-site development activity is subject to the Planning and Zoning Code. The Planning and Zoning Code includes development standards for the various districts in the City. As shown in Figure III-2, Zoning Map, the Project Site is zoned [Q]C2-1VL-CDO (Commercial use [Qualified] – Very Limited Height District No. 1VL – Community Design Overlay District), wherein the existing commercial structures are located and which consists of approximately 78 percent of the Project site; and R3-1 (Multiple Family Residential – Height District No. 1), wherein the ancillary surface parking lot is located in the rear of the Project site and

which consists of approximately 22 percent of the Project site. The "Q" qualified condition for the commercially-zoned portion of the Project site relates to this portion of the site's location within the West Pico Boulevard CDO; Project consistency with the West Pico Boulevard CDO is discussed under the subsequent subheading below.

A generalized summary of land uses allowed in the C2 Zone include the following:[58]

- C1.5 uses (limited commercial);
- Retail with limited manufacturing;
- Service stations and garages;
- Retail control business;
- Churches;
- Schools;
- Auto Sales; and
- R4 uses

A generalized summary of land uses allowed in the R3 Zone include the following:[59]

- R2 uses
- Apartment houses
- Multiple dwellings
- Child care (20 maximum)

Pursuant to California Government Code Section 65915 and LAMC Section 12.22-A,25, the Project reserves 15 percent of the base density (or 15 units) for deed-restricted Very Low Income households, and is therefore entitled to: (1) a 35 Percent Density Bonus, pursuant to LAMC Section 12.22-A,25, and 3 on-menu incentives, and (2) Permit 0.5 parking stall per bedroom as pursuant to Assembly Bill 744, which applies to mixed-income projects within a half-mile of a major transit stop (Sepulveda Boulevard and Exposition Boulevard, and Sepulveda Boulevard and Pico Boulevard).

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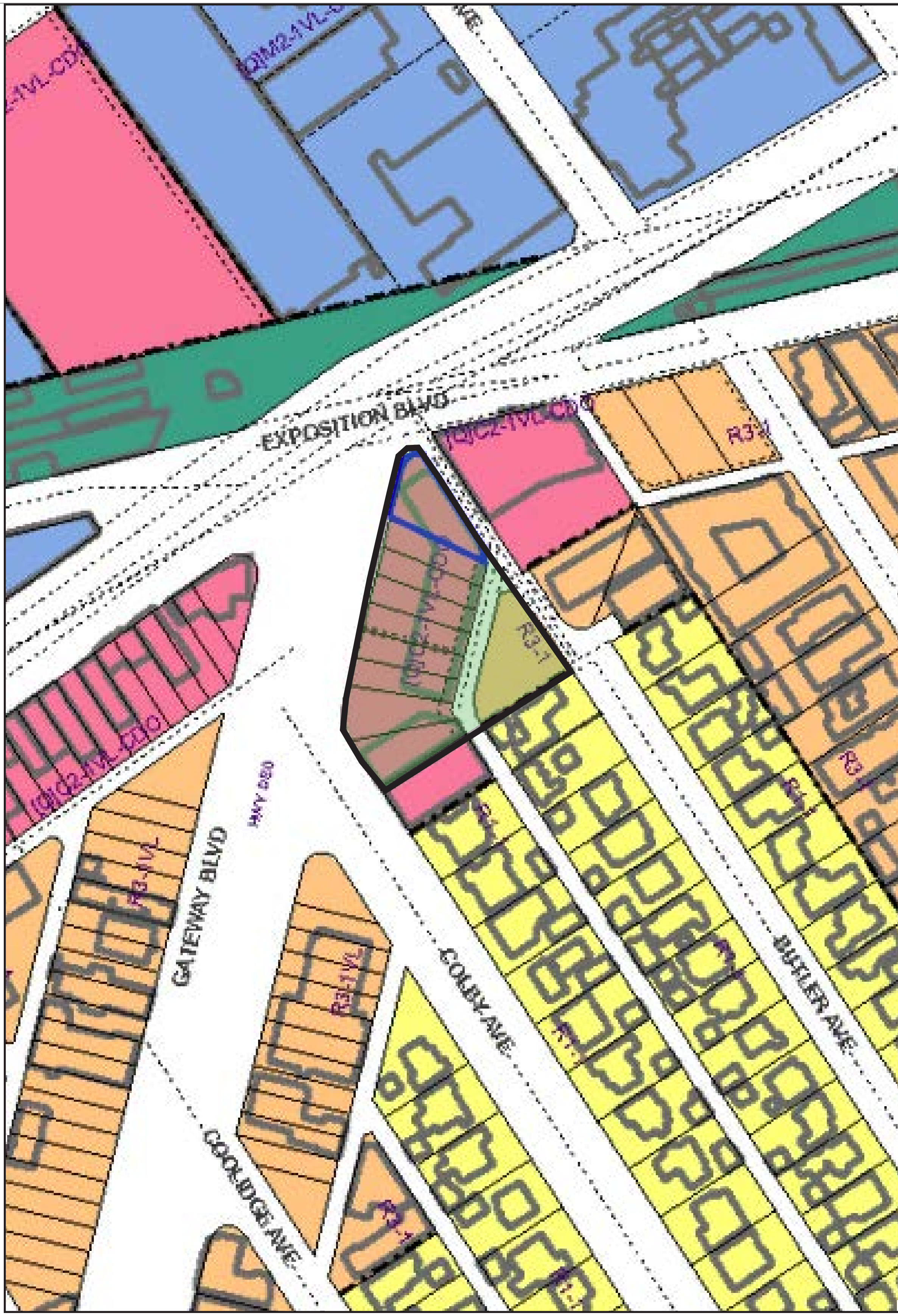
[58] *City of Los Angeles Department of City Planning, Generalized Summary of Zoning Regulations, January 24, 2006.*

[59] *Ibid.*



Project Site

Source: City of Los Angeles Planning Department, December 2015.

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Figure III-2
Zoning Map

The Project also seeks the following on-menu incentives consistent with the State density bonus law and LAMC Section 12.22-A,25, which are required to accommodate the Project's affordable housing units:

- Pursuant to LAMC Section 12.22-A,25(f)(4)(i) to permit an increase in FAR of 35 percent on the [Q]C2-1VL-CDO zoned portion of the site to a maximum of 2.02:1 and 4.05:1 in the R3-1 zoned portion for an average of 2.24:1 FAR across the site;
- Pursuant to LAMC Section 12.22-A,25(f)(5) to permit an increase in building height of 11 feet for a maximum height of 56 feet;
- Pursuant to LAMC Section 12.22-A,25(f)(8) to permit the averaging of FAR, density, parking, and open space across and permit vehicular access from a less restrictive zone to a more restrictive zone;

The Project's proposed land use would be consistent with the current C2 and R3 zones at the Project site per the Planning and Zoning Code. Additionally, the Project would comply with the applicable front and side yard setback requirements set forth in the Planning and Zoning Code for both of these zones pending the determination of yards by the Advisory Agency to allow Gateway Boulevard and Colby Avenue as Front Yards and all other yards as Side Yards pursuant to LAMC Section 17.03-A. This yard determination is part of the Project's Vesting Tentative Tract Map, pursuant to LAMC Section 17.06, to create a one-lot subdivision, including the merger and vacation of a public alley to create 129 residential condominiums.

The C2-zoned portion of the Project site permits a 1.5:1 FAR and the R3-zoned portion of the Project site permits a 3:1 FAR. Additionally, the C2 Zone permits density at 1 unit per 400 square feet of land area (84 units) and the R3 Zone permits density at 1 unit per 800 square feet of land (13 units). It should be noted that these are densities after dedications and alley vacation are taken into account. The Project's requested averaging of FAR, density, open space, and parking would enable efficient use of the site and development of a unified, cohesive, and functionally integrated design. Overall, the Project proposes a 2.24:1 FAR over the entire site after approval of the on-menu incentive for increased FAR (2.02:1 FAR in the C2-zoned portion and 4.05:1 FAR in the R3-zoned portion). Furthermore, as noted, the Project site's existing zoning would allow for a total of 97 residential dwellings units; however, per LAMC Section 12.22-A,25(c)(1), since the Project would be setting aside 15 dwelling units as affordable housing for Very Low Income households (approximately 15 percent of the allowed 97 residential dwelling units) the Project is allowed a 35 percent density bonus. This 35 percent density bonus would allow for an additional 34 residential dwelling units at the Project site for a total of 131 dwelling units, two units more than the 129 units proposed by the Project.

Moreover, the C2-zoned portion of the Project site is located in Height District No. 1VL. LAMC Section 12.21.1 limits the height of structures in this zone to 45 feet tall for residential-only projects. The balance of the Project site in the R3-zoned portion is located within Height District No. 1, which also restricts building heights to 45 feet tall, without a limitation on building stories. As shown above, the Project is requesting an increase in the allowable building height of 11 feet to permit the maximum 56-foot building. In compliance with LAMC Section 12.21.1-A,10, the proposed building containing four 2-bedroom, 2-story townhome-type units located in the rear of the Project site in the residentially-zoned portion would not exceed 25 feet in height within 0-50 feet from the adjacent R1 lot.

The Project is also requesting an on-menu incentive to permit vehicular access, circulation, and distribution of open space across both zones. A strict application of the LAMC regulations would preclude access and circulation for the occupants and visitors of the proposed building between each respective zone, even though the building is functionally designed as one unified development. The proposed

building and subterranean parking would be built over both zones, and thus, through the requested FAR averaging and density, the Project would be able to provide pedestrian and vehicular access between a more restrictive zone and less restrictive zone.

Consistent with the City's Density Bonus Ordinance, the Project Applicant has selected, by-right, 0.5 parking space per bedroom pursuant to Assembly Bill 744. The discussion under threshold question 16.f), below, describes the vehicle and bicycle parking requirements as well as the amounts provided by the Project. As shown therein, the Project would exceed the City's vehicle and bicycle parking requirements by providing 154 parking stalls and 146 bicycle parking spaces. Therefore, with approval of the density bonus and affordable housing incentives as set forth in LAMC Section 12.25-A,25, the Project would be consistent with the City's Planning and Zoning Code.

West Pico Boulevard Community Design Overlay District

The Project site is located within the West Pico Boulevard CDO, which includes commercially and industrially zoned properties located between the San Diego Freeway (Interstate 405) on the east, Tennessee Avenue to Federal Avenue on the north, Pico Boulevard to the south, and Centinela Avenue (City boundary) on the west. The West Pico Boulevard CDO, provides guidance and direction in the design of buildings including storefronts that will enhance the appearance of the area. The overall CDO goal for Pico Boulevard is to present a distinct identity as the neighborhood's main commercial corridor, and that development visually provides a sense of place. Pico Boulevard has the potential of becoming an active, vibrant and vital community-serving, pedestrian-oriented commercial area. An additional goal of the West Pico Boulevard CDO is to encourage a combination of small-scale neighborhood commercial uses with multi-family residential. The following discussions demonstrate the Project would be in substantial conformance with the applicable design guidelines and standards of the West Pico Boulevard CDO. The Project must obtain a West Pico Boulevard CDO Plan Approval, pursuant to LAMC Section 13.08, for construction of a new building.

Standard 1 – Building Orientation

The Project involves the removal of existing commercial uses and buildings containing automobile service facilities, dry cleaner, tire store, and restaurant, set back and separated from the public right-of-way by a surface parking lot. The Project building would include ground-floor "live/work" residential units situated along the Gateway Boulevard frontage directly adjacent to and accessible from the public right-of-way. The primary pedestrian entrance and lobby would also be prominently situated at the primary street frontage along Gateway Boulevard with bicycle and vehicle access along Butler Avenue.

Standard 2 – Building Setback/Pedestrian Orientation

The building orientation along Gateway Boulevard would enhance the pedestrian experience with new sidewalk, street trees, and ground-floor activation (i.e., "live/work" residential units). The primary pedestrian entrances to the site have been pulled forward in its design to the property line to provide a direct connection with the street. The ground-floor "live/work" units spanning the Gateway Boulevard frontage of the building frontage have been designed to provide façade transparency and pedestrian scale.

Standard 4 – Articulation

The Project design integrates horizontal and vertical articulation using high-quality architectural materials to provide variation in building color and texture. The Project would include both projected and recessed balconies, windows, and façade modulations along the street frontages to break up the building massing. The ground floor has been designed as a unified element which connects with the upper floors to provide a strong base that anchors the building. The windows for the residential units on the upper floors have been designed with variations in building fenestration and size to differentiate them from the spaces below on the ground-floor along Gateway Boulevard. The ground-floor has greater window-to-wall ratios with transparency along the curtain wall, which allows views into these spaces to provide visual interest and accessibility. Parking for the entire building would be located within the two-level subterranean parking structure, and would not negatively impact Project design along street frontages or building façades.

Standard 6 – Entry Treatment

The residential entries would be located along the property line at the street frontages and oriented toward the length of the Project along Gateway Boulevard. The space along the frontage would include landscaping to create an inviting entrance into these spaces. The primary lobby entrance would be detailed with rectangular window arrangements of appropriate size and scale to emphasize the primary street corner in compliance with West Pico Boulevard CDO requirements for façade transparency.

Standard 8 – Infill Development

As the first new residential project along this portion of Pico Boulevard and Gateway Boulevard, redevelopment of the Project site would help revitalize the area concurrent with new transit opportunities in the neighborhood. The adjacent properties contain a mix of existing building styles, and the modern design of the proposed Project would enhance the area along a major corridor in West Los Angeles. The proposed building would include variation in building façade to accommodate residential balcony space, which provides massing relief along the major street frontages. The rear portion of the Project site has been designed to be fully compliant with transitional height, providing a substantial buffer from the R1-zoned residential uses and would include landscaping and open space to provide additional buffering and separation from residential-zoned properties to the east.

Standard 9 – Mechanical Equipment Screening and Trash Containers

Rooftop mechanical equipment would be screened. Trash/recycling areas would be provided within the interior of the Project, accessed from Butler Avenue and entirely shielded from public view.

Standard 10 – Exterior Surface Materials

The proposed building facades would feature a variety of materials and accents, including new paint and white plaster, spandrel glass, aluminum casement windows, and textured trespa paneling. The overall color scheme of the building has been designed with neutral and strong accent colors that are compatible with the architectural theme of the building.

Standard 11 – Ground Floor Lighting

Outdoor lighting would be used minimally to illuminate the building for safety, security, and business identification for the "live/work" residential units. Exterior lighting would be directed on-site and comply with LAMC for site lighting requirements.

Standard 14 – Landscaping and Street Trees

The Project would include landscape planters along the ground floor that serve to soften the edge of the building along the public right-of-way, while highlighting the new building entrances in a manner that contributes to an inviting pedestrian environment. The Project would include shade trees and drought-tolerant landscaping along the public right-of-way, which would improve the frontage for the community. Removal of existing trees would be replaced on a 1:1 basis with removal of the few on-site protected trees to be replaced on a 2:1 basis.

Los Angeles Green Building Code

The Los Angeles Green Building Code is based on the California Green Building Standards Code (commonly known as CALGreen), which was developed and mandated by the State to attain consistency among the various jurisdictions within the State with the specific goals to reduce a building's energy and water use, reduce waste, and reduce the carbon footprint. The following types of projects are subject to the Los Angeles Green Building Code:

- All new buildings (residential and non-residential);
- Every building alteration with a building permit valuation of $200,000 or more (residential and non-residential);
- Residential alterations that increase the building's conditioned volume; and
- Every building addition (residential and non-residential)

The Project would meet the requirements in the Los Angeles Green Building Code. The building would incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star®-rated appliances, water saving/low-flow fixtures, non-volatile organic compound paints/adhesives, drought-tolerant planting, and high performance building envelopment. The proposed building would accommodate solar photovoltaic panels and on-site electric vehicle chargers.

Walkability Checklist: Guidance for Entitlement Review

In January 2007, the Department of City Planning created the Walkability Checklist: Guidance for Entitlement Review ("Walkability Checklist"). The purpose of the Walkability Checklist is to guide the Department of City Planning, as well as developers, architects, engineers, and all community members, in creating enhanced pedestrian movements, access, comfort, and safety contributing to overall walkability throughout the City. 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 in the Walkability Checklist should be considered in a project, although not all strategies would be appropriate in every project. While the Walkability Checklist is neither a requirement nor part of the LAMC, it provides guidance for consistency relating to the policies contained in the General Plan Framework Element. Incorporating these guidelines into a project's design

encourages pedestrian activity, higher quality urban forms, and "place-making." The following is an analysis of the Project's consistency with the applicable Walkability Checklist guidelines.

Sidewalks

The Project generally supports the walkability guidelines discussing sidewalks, which provide that pedestrian corridors should be delineated by creating a consistent rhythm, should be wide enough to accommodate pedestrian flow, and provide pedestrian safety, specifically by creating a clear separation from the roadway and from traffic. Primary pedestrian access would be provided via sidewalks along Gateway Boulevard fronting the Project site. Gateway Boulevard currently has a planted median between the sidewalk and the street. This median would be maintained and/or improved under the proposed Project, further protecting pedestrians from automobile traffic along the Project street frontage. Moreover, the Project includes ground-floor "live/work" residential units along Gateway Boulevard with stoops and direct entryways from the sidewalk, which encourages pedestrian activity.

Utilities

The Project generally supports the walkability guidelines discussing utilities, which provide that utilities should ideally be placed underground in order to improve and preserve the character of the street and neighborhood, increase visual appeal, and minimize obstructions in the pedestrian travel path. If new utility equipment is needed, the Project would place utility equipment underground and/or in the specified zones outlined in the Walkability Checklist.[60]

Building Orientation

The Project generally supports the walkability guidelines discussing building orientation, which provide that a building's placement on a site establishes its relationship to the sidewalk and street and could enhance pedestrian activity. The Project's building would be situated along the Gateway Boulevard, Colby Avenue, Pico Boulevard/Exposition Boulevard frontages directly adjacent to and accessible from the public right-of-way. The primary pedestrian entrance and lobby would also be prominently situated at the corner of Gateway Boulevard and Pico Boulevard/Exposition Boulevard with bicycle and vehicle access along Butler Avenue. Moreover, the Project includes ground-floor "live/work" residential units along Gateway Boulevard with stoops and direct entryways from the sidewalk, which encourages pedestrian activity.

Off-Street Parking and Driveways

The Project generally supports the walkability guidelines discussing off-street parking and driveways, which provide that the safety of the pedestrian is primary in an environment where pedestrians and automobiles must both be accommodated. Parking for the entire building would be located within the two-level subterranean parking structure accessed from Butler Avenue along the side of the Project site, and would not endanger pedestrians. Butler Avenue is currently blocked off and gated south of the Project site. The portion of Butler Avenue between the barricade and Pico Boulevard/Exposition Boulevard is currently improved and operating as an alley. The Project would not change this condition. This short segment of Butler Avenue is shared with one neighbor along the northeast side of the roadway. The neighboring building is constructed along the property line. In order to improve the pedestrian

[60] *The Project does not include the undergrounding of existing aboveground utilities.*

experience and safety several improvements are proposed by the Project as design features. These features are also enumerated under threshold question 16.d), below. These features include: blinking lights to alert motorists of potential pedestrian crossings where Butler Avenue intersects with the sidewalk; a rumble strip to slow vehicle speeds by requiring motorists to approach cautiously as they exit Butler Avenue; signage to increase awareness of pedestrian activity along Gateway Boulevard, Pico Boulevard and Exposition Boulevard; mirrors to increase visibility of pedestrian crossings for motorists on Butler Avenue; and enhanced pavement markings to clearly delineate the sidewalk pathways. The primary pedestrian access to the Project (i.e., the lobby) would be accessed from the corner of Gateway Boulevard and Pico Boulevard/Exposition Boulevard, and as such, the Project would generate pedestrian activity.

On-Site Landscaping

While building plans are still in the preliminary phase, the Project would be designed to generally support the walkability guidelines discussing on-site landscaping. Consistent with these guidelines, the Project would include landscaping on the ground floor and rooftop open spaces and to soften the edge of the building along the public right-of-way, while highlighting the new building entrances in a manner that contributes to an inviting pedestrian environment. Landscaping would be used to provide separation between service areas and public zones, as well as to define edges throughout the varying elements of the Project.

Building Façade

The Project generally supports the walkability guidelines discussing building façade, which provide that a building's facade could be employed to meet many objectives for a safe, accessible, and comfortable pedestrian environment, specifically by adding visual interest and emphasizing pedestrian movement and comfort. The Project design integrates horizontal and vertical articulation using high-quality architectural materials to provide variation in building color and texture. The Project would include both projected and recessed balconies, windows, and façade modulations along the street frontages to break up the building massing. The ground floor has been designed as a unified element which connects with the upper residential floors to provide a strong base that anchors the building. The windows for the residential units have been designed with variations in building fenestration and size to differentiate them from the spaces below. The ground-floor has greater window-to-wall ratios with a high degree of transparency along the curtain wall, which allows views into these spaces to provide visual interest and accessibility.

Building Signage and Lighting

While building plans are still in the preliminary phase, the Project would be designed to generally support the walkability guidelines discussing building signage and lighting, which describe signage as part of the visual urban language and contributing to neighborhood identity and "place-making." The Project would include pedestrian-scale way-finding signage. Outdoor lighting would be used minimally to illuminate the building for safety, security, and business identification for the "live/work" residential units. Exterior lighting would be directed on-site and comply with LAMC for site lighting requirements. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn, but would be designed to prevent light trespass onto adjacent properties.

Summary of Consistency

As shown above, the Project would be consistent with applicable goals of SCAG's RCP and RTP/SCS, SCAQMD's AQMP, and Metro's CMP. Additionally, the Project would be consistent with the applicable objectives and policies set forth in the City's plans and zoning including the General Plan, Community Plan, WLA TIMP, Planning and Zoning Code, West Pico Boulevard CDO, Los Angeles Green Building Code, and the Walkability Checklist. Therefore, the Project would not result in a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project, and impacts would be less than significant. No mitigation measures are required.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant adverse effect could occur if a project site were located within an area governed by a habitat conservation plan or natural community conservation plan.

As discussed under threshold question 4.f), above, no such plans presently exist which govern any portion of the Project site. Furthermore, the Project site is within a highly urbanized area of West Los Angeles and the site is currently fully developed. Therefore, no impact would occur and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the topics listed in the land use and planning analysis above, including community division, consistency with land use plans, and consistency with habitat conservation plans. The cumulative impacts study area for land use and planning is the extent of the related projects and the Palms-Mar Vista-Del Rey Community Plan Area.

With respect to community division and habitat conservation plans, it is unknown whether or not any of the related projects or other development in the Community Plan Area would divide an existing community or conflict with a habitat conservation plan. However, as the Project would have no impact with respect to community division and habitat conservation plans, it would not contribute to a cumulative impact.

Development of the related projects is expected to occur in accordance with adopted plans and regulations. It is also reasonably anticipated that most of the related projects would be compatible with the zoning and land use designations of each related project site and its existing surrounding uses. In addition, it is reasonable to assume that the related projects under consideration in the surrounding area would implement and support local and regional planning goals and policies. Therefore, cumulative land use impacts would be less than significant.

11. MINERAL RESOURCES

a) Would the project 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. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the project site is located in an area used or available for extraction of a regionally-important mineral

resource, or if the project development would convert an existing or future regionally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important mineral resource extraction. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone (MRZ) 2 Zone or other known or potential mineral resource area, and
- Whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance.

The Project Site is fully developed and no oil wells are present.[61] Additionally, the Project Site is not located within an oil field or oil drilling area,[62] nor within a surface mining district or MRZ-2 zone.[63] The Project would not affect ongoing extraction activities and there would be no impact on existing or future regionally important mineral extraction sites. The Project would not involve mineral extraction activities, nor are any such activities presently occurring on the Project Site. Therefore, no impact would occur and no mitigation measures are required.

b) Would the project 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. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the project site is located in an area used or available for extraction of a locally-important mineral resource, or if the project development would convert an existing or future locally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for locally-important mineral resource extraction. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a MRZ-2 Zone or other known or potential mineral resource area, and
- Whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance.

There are no oil extraction operations and drilling or mining of mineral resources at the Project Site, nor is the Project site within an area identified for such uses. 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

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[61] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: January 2016.*

[62] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit E, Oil Field and Oil Drilling Areas, Adopted November 1996.*

[63] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Conservation Element, Exhibit A, Mineral Resources, Adopted September 2001.*

general plan, specific plan, or land use plan. Therefore, no impact would occur and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the topics listed in the mineral resources analysis above, including loss of availability of a known mineral resource or locally important mineral resource recovery site. The cumulative impacts study area for mineral resources is the extent of the related projects.

It is unknown whether or not any of the related project sites contain mineral resources. However, as the Project would have no impact on mineral resources, it would not contribute to a cumulative impact. Therefore, there would be no cumulative impact on mineral resources and no mitigation measures are required.

12. NOISE

a) Would the project result in 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 impact may occur if a project would generate excess noise that would cause the ambient noise environment at the project site to exceed noise level standards set forth in the City's General Plan Noise Element and the City Noise Ordinance (LAMC Sections 111.00 through Section 116.01). Implementation of the Project would result in an increase in ambient noise levels during both construction and operation, as discussed in detail below.

Construction Noise

Construction noise impacts would be significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 A-weighted decibels (dBA) at a distance of 50 feet from the noise source. Additionally, as defined in the *L.A. CEQA Thresholds Guide*, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. Furthermore, the *L.A. CEQA Thresholds Guide* also states that construction activities lasting more than 10 days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive land use, would also normally result in a significant impact. However, the above noise limitation do not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment.

Construction of the Project would require the use of heavy equipment for demolition, grading, excavation and foundation preparation, the installation of utilities, paving, and building construction. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity.

The U.S. Environmental Protection Agency has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. The data pertaining to the types of construction equipment and activities that would occur at the Project site are

presented in Table III-13, Noise Range of Typical Construction Equipment, and Table III-14, Typical Outdoor Construction Noise Levels, respectively, at a distance of 50 feet from the noise source (i.e., reference distance).

Table III-13
Noise Range of Typical Construction Equipment

Construction Equipment	Noise Level in dBA L_{eq} at 50 Feet[a]
Front Loader	73-86
Trucks	82-95
Cranes (moveable)	75-88
Cranes (derrick)	86-89
Vibrator	68-82
Saws	72-82
Pneumatic Impact Equipment	83-88
Jackhammers	81-98
Pumps	68-72
Generators	71-83
Compressors	75-87
Concrete Mixers	75-88
Concrete Pumps	81-85
Back Hoe	73-95
Tractor	77-98
Scraper/Grader	80-93
Paver	85-88

[a] *Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.*

Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

Table III-14
Typical Outdoor Construction Noise Levels

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L_{eq})	Noise Levels at 60 Feet with Mufflers (dBA L_{eq})	Noise Levels at 100 Feet with Mufflers (dBA L_{eq})	Noise Levels at 200 Feet with Mufflers (dBA L_{eq})
Ground Clearing	82	80	76	70
Excavation, Grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71
Finishing	86	84	80	74

Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

The noise levels shown in Table III-14 represent composite noise levels associated with typical construction activities, which take into account both the number of pieces and spacing of heavy construction equipment that are typically used during each phase of construction. As shown in Table III-14, construction noise during the heavier initial periods of construction is presented as 86 dBA L_{eq} when measured at a reference distance of 50 feet from the center of construction activity. These noise levels

would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 84 dBA L_{eq} measured at 50 feet from the noise source to the receptor would reduce to 78 dBA L_{eq} at 100 feet from the source to the receptor, and reduce by another 6 dBA L_{eq} to 72 dBA L_{eq} at 200 feet from the source to the receptor. Construction activities associated with the Project would be expected to occur and generate noise at off-site locations consistent with the estimates provided in Table III-14.

Noise sensitive receptors within the vicinity of the project site include residences located to the south, southwest and to the east, and a religious institution and a school to the south. Due to the use of construction equipment during the construction phase, the Project would expose surrounding off-site receptors to increased ambient exterior noise levels. It should be noted, however, that any increase in noise levels at off-site receptors during construction of the Project would be temporary, and would not generate continuously high noise levels, although occasional single-event disturbances from construction are possible. Additionally, the construction noise during the heavier initial periods of construction (i.e., demolition and excavation work) typically would be reduced in the later construction phases (i.e., interior building construction at the proposed building) as the proposed physical structure would break the line-of-sight noise transmission from the construction area to the nearby sensitive receptors.

LAMC Section 41.40 regulates noise from construction activities. Exterior construction activities that generate noise are prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday. Construction activities are prohibited on Sundays and all federal holidays. The construction activities associated with the Project would comply with these LAMC requirements. In addition, pursuant to LAMC Section 112.05, construction noise levels are exempt from the 75 dBA threshold if all technically feasible noise attenuation measures are implemented. Thus, based on the exception set forth in LAMC Section 112.05, implementation of the following mitigation measures would reduce the Project construction noise levels to the maximum extent that is technically feasible and temporary construction noise impacts would be less than significant. To ensure compliance with this applicable standards, the following regulatory compliance measure is recommended.

Regulatory Compliance Measure

RCM 12-1. The Project shall comply with the City of Los Angeles Noise Ordinance and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

Operational Noise

Upon completion and operation of the Project, on-site operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed for the proposed building. However, the noise levels generated by these equipment types are not anticipated to be substantially greater than those generated by the current HVAC equipment serving the existing uses on the Project site or adjacent buildings in the Project vicinity. As such, the HVAC equipment associated with the Project would not represent a new source of noise in the Project site vicinity. Additionally, the operation of this and any other on-site stationary sources of noise would 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 5 dBA. Therefore, the operational noise impact would be less than significant and no mitigation measures are required.

Exposure to Metro Rail Expo Line Noise

The Project Site is located approximately 115 feet south of the operational Metro Rail Expo Line (also known as the Exposition Corridor Transit Project Phase 2). Based on a review of the Exposition Corridor Transit Project Phase 2 Final EIR, the Project Site could experience exterior noise levels of approximately 65 dBA due to light-rail vehicle operations.[64] While the Expo Line passed by twice during the noise measurement, the primary noise sources for the vicinity of the Project site are not attributable to the Expo Line. In addition, on-site residences would not be adversely impacted by elevated ambient urban noise levels because the Project would be constructed to meet and exceed Title 24 insulation standards of the California Code of Regulations for residential buildings, which serves to provide an acceptable interior noise environment for sensitive uses. Specifically, the Project would be designed and constructed to ensure interior noise levels would be at or below a CNEL of 45 dBA in any habitable room of the project. As such, impacts associated with interior noise levels at the proposed residences 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. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level, while RMS is defined as the square root of the average of the squared amplitude of the level. PPV is typically used for evaluating potential building damage; however, velocity in decibels (VdB) is also a measurement of groundborne vibration. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction Vibration

Construction activities for the Project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate though the ground and diminishes in intensity with distance from the source. Vibration impacts can result in slight damage of buildings at the highest levels. Thus, construction activities could have an adverse impact on sensitive structures (i.e., building damage).

In terms of construction impacts on buildings, the City has not adopted policies or guidelines relative to groundborne vibration. Consequently, as both the City and Los Angeles County do not have a significance threshold to assess vibration impacts during construction, the Federal Transit Administration (FTA) and California Department of Transportation's (Caltrans) vibration standards for buildings are used to evaluate

[64] *Exposition Corridor Transit Project Phase 2 FEIR, Table 3.12-7 (Summary of Clusters with Noise Impacts for Residential Category 2 Land Uses). The Project site is located nearest to Civil Station 669+00, which was modeled to show noise levels of 65 dBA at 115 feet from the near track; website: http://www.buildexpo.org/about-expo/phase-2-feir-document/, accessed: March 18, 2016.*

potential construction impacts. Based on the FTA and Caltrans criteria, construction impacts relative to groundborne vibration would be significant if the following were to occur:[65]

- Project construction activities would cause a PPV groundborne vibration level to exceed 0.5 inches per second at any building that is constructed with reinforced-concrete, steel, or timber;
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.3 inches per second at any engineered concrete and masonry buildings;
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.2 inches per second at any non-engineered timber and masonry buildings; or
- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.12 inches per second at any historical building or building that is extremely susceptible to vibration damage.

Table III-15, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate at the Project site during construction. As shown in Table III-15, vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity, with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

Table III-15
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

Note: in/sec = inches per second

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, 2006.

With respect to construction vibration impacts upon existing off-site structures, there are no known structures adjacent to the Project site that would be considered structurally fragile or susceptible to vibration damages. The surrounding buildings consist primarily of engineered concrete and masonry buildings, and reinforced-concrete, steel, or timber buildings. As such, the potential for construction-related vibration damage to off-site structures would be considered low. In addition, it should be noted that if the Project is approved for subterranean parking and excavation would occur, the Project would be subject to compliance with Section 91.3307 of the LAMC (Protection of Adjoining Property). Specifically, Section 91.3307.1 (Protection Required) states adjoining public and private property shall be protected from damage during construction, remodeling and demolition work. Protection must be provided for footings, foundations, party walls, chimneys, skylights and roofs. Provisions would be made

[65] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006; and California Department of Transportation, Transportation- and Construction-Induced Vibration Guidance Manual, June 2004.*

to control water runoff and erosion during construction or demolition activities. For excavations, adjacent property would be protected as set forth in Section 832 of the Civil Code of California. Prior to the issuance of any permit, which authorizes an excavation where the excavation is to be of a greater depth than the walls or foundation of any adjoining building or structure and located closer to the property line than the depth of the excavation, the owner of the site would provide LADBS with evidence that the adjacent property owner or owners have been given a 30-day written notice of the intent to excavate. This notice would state the depth to which the excavation is intended to be made and when the excavation would commence. This notice shall be by certified mail, return receipt requested. Therefore, impacts with respect to potential building damages from construction-related vibration would be less than significant.

Operational Vibration

The Project involves the construction and operation of multi-family residential uses and would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large commercial and industrial projects. Groundborne vibrations at the Project site and immediate vicinity currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways, and the proposed land uses at the Project site would not result in a substantive increase of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project site, these trips would typically only occur once a week and would not be any different than those presently occurring in the vicinity of the Project site. As such, vibration impacts associated with operation of the Project would be less than significant and no mitigation measures are 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 were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the project. As defined in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on noise levels from operations if the project causes the ambient noise level measured at the property line of affected uses that are shown in Table III-16, Community Noise Exposure, to increase by 3 dBA in Community Noise Equivalent Level (CNEL) to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase. Thus, a significant impact would occur if noise levels associated with operation of a project would increase the ambient noise levels by 3 dBA CNEL at homes where the resulting noise level would be at least 70 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact. Generally, in order to achieve a 3 dBA CNEL increase in ambient noise from traffic, the volume on any given roadway would need to double. Additionally, in analyzing potential impacts in terms of CNEL, the analysis also addresses increases in on-site noise sources per the provisions of LAMC, which establishes a L_{eq} standard of 5 dBA over ambient conditions as constituting a LAMC violation.

Table III-16
Community Noise Exposure

Land Use	Normally Acceptable[a]	Conditionally Acceptable[b]	Normally Unacceptable[c]	Clearly Unacceptable[d]
Single-family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 75
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 75

Table III-16
Community Noise Exposure

Land Use	Normally Acceptable[a]	Conditionally Acceptable[b]	Normally Unacceptable[c]	Clearly Unacceptable[d]
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 75
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 70
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 75
Playgrounds, Neighborhood Parks	50 - 70	---	67 - 75	above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	---	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	---

[a] 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.

[b] 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 systems or air conditioning will normally suffice.

[c] 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.

[d] Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: Office of Planning and Research, State of California Genera Plan Guidelines, October 2003 (in coordination with the California Department of Health Services); City of Los Angeles, General Plan Noise Element, adopted February 1999.

Traffic Noise

In order for a new noise source to be audible, there would need to be a 3 dBA or greater CNEL noise increase. As discussed above, the traffic volume on any given roadway would need to double in order for a 3 dBA increase in ambient noise to occur. According to the *L.A. CEQA Thresholds Guide*, if a project would result in traffic that is less than double the existing traffic, then the project's mobile noise impacts are assumed to be less than significant.

As detailed in the Project's Traffic Report (see Appendix H to this IS/MND), the Project is estimated to generate a net increase of 455 daily trips, including 24 AM peak hour trips and 12 PM peak hour trips. As shown in greater detail in the Project's Traffic Report, the highest Project-related trip increase would occur at intersection number 9 (Sawtelle Boulevard and Pico Boulevard) during the AM peak hour with 26 peak hour trips. When compared to the existing 4,978 vehicle trips occurring at intersection number 9 during the AM peak hour, it is clear that the Project would not double the traffic volumes on any roadway segment in the vicinity of the Project site. As such, the Project would not increase roadway noise levels by 3 dBA, and thus, traffic noise impacts would be less than significant.

Stationary Noise Sources

New stationary sources of noise, such as mechanical HVAC equipment would be installed for the proposed building. As discussed under threshold question 11.a), above, the design of this equipment would 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 5 dBA. Thus, because the noise levels generated by the HVAC equipment serving the Project would not be allowed to exceed the ambient noise level by 5 dBA on the premises of the adjacent properties, a substantial permanent increase in noise levels would not occur at the nearby sensitive receptors. Therefore, stationary noise source impacts would be less than significant and no mitigation measures are required.

Parking Noise

Noise would be generated by activities within the proposed ground-level and subterranean parking areas. Sources of noise within the parking lot would include engines accelerating, doors slamming, car alarms, and people talking. Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. It is anticipated that parking-related noise would be substantially similar to the existing street parking, roadway activity, and existing surface parking lots in the Project site vicinity. In addition, parking-related noise generated by motor driven vehicles within and around the Project site is regulated under LAMC. Specifically, with regard to motor-driven vehicles, LAMC Section 114.02 prohibits the operation of any motor-driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than 5 dBA. As such, noise impacts associated with the Project's ground-level and subterranean parking areas would be less than significant and no mitigation measures are 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 a proposed project were to result in a substantial temporary or periodic increase in ambient noise levels above existing ambient noise levels without the project.

As discussed above, impacts are expected to be less than significant for construction noise and vibration, and operational noise and vibration would be less than significant. Therefore, impacts related to substantial temporary or periodic increase in ambient noise levels in the Project vicinity 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 expose people residing or working in the project area to excessive noise levels?

No Impact. The Santa Monica Municipal Airport is the closest airport to the Project site, located approximately 0.75 mile to the southwest. However, the Project site is not located within the 60, 65, or 70 dBA CNEL contours identified for the airport,[66] and the Project site is not located within an airport land

[66] *Santa Monica Municipal Airport, Calendar Year 2014 CNEL Contours, Exhibit 3-4, page 15, October 2014, website:*

use plan.[67] As such, the proposed Project would not expose people to excessive aircraft noise levels. Therefore, no impact would occur and no mitigation measures are required.

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. This question would apply to a project only if the project site were located 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 in the vicinity of a private airstrip. Therefore, no impact would occur and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the topics listed in the noise analysis above, including construction noise, operational noise, vibration, etc. The cumulative impacts study area for noise is the extent of the related projects.

Development of the Project in combination with the related projects would result in an increase in construction noise, traffic noise, as well as on-site stationary noise sources in an already urbanized area of the City. With respect to construction impacts, it is unknown whether or not any of the related projects would have overlapping construction schedules with the Project, and none of the related projects are in the immediate vicinity of the Project site except for Related Project No. 29 (Exposition Transit Corridor Phase II). Related Project No. 29 is a transit infrastructure project located approximately 115 feet to the north of the Project site, and construction is already completed. Operation is anticipated to commence on May 20, 2016. As such, albeit speculative, even conservatively assuming overlapping construction schedules, a potential cumulative noise impact would not occur due to the distance of the Project site with other related projects which have not yet been constructed as construction noise from the Project and each related project (that has not yet been built) would be localized. Similar to the Project, the related projects would be required to comply with the City's Noise Ordinance as well as mitigation measures that may be prescribed pursuant to CEQA that require significant impacts to be reduced to the extent feasible. As such, it is anticipated that the cumulative construction noise impact would be less than significant.

With respect to cumulative traffic noise impacts, it should be noted that the Project's traffic noise impacts are based on the predicted traffic volumes presented in the Traffic Report. Based on the Project's estimated trip generation, it is clear that the Project would not double the traffic volumes on any roadway segment or study intersection in the Project site vicinity. It is unknown whether or not any of the related projects would double the traffic volumes on any roadway segment or study intersection. If there were a noise impact, the Project would not make a cumulatively considerable contribution to the impact for the reasons described above.

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https://www.smgov.net/uploadedFiles/Departments/Airport/Noise_Mitigation/SMOreportcnel2014.pdf, accessed: February 2017.

[67] *Los Angeles County Airport Land Use Commission, Airport Influence Area, Santa Monica Airport, May 2003, website: http://planning.lacounty.gov/assets/upl/project/aluc_airport-santa-monica.pdf, accessed: January 2016.*

13. POPULATION AND HOUSING

a) Would the project 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. For the purpose of this issue, a significant impact may occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the project area that would otherwise not have occurred as rapidly or in as great a magnitude. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on population and housing growth shall be made considering the following factors:

- The degree to which a project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment;
- Whether a project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and
- The extent to which growth would occur without implementation of a project.

As part of its comprehensive planning process for the Southern California region, SCAG, the MPO for Southern California with exception to San Diego County, has divided its jurisdiction into 14 subregions. The Project site is located within the City of Los Angeles subregion, which includes all areas within the boundaries of the City of Los Angeles, the City of San Fernando, and a portion of unincorporated Los Angeles County. However, the numbers discussed herein pertain only to the City of Los Angeles. SCAG's 2014 population and housing estimates for the City were 3,904,657 residents and 1,335,399 total households.[68] Moreover, SCAG estimates the population of the City will increase to 4,609,400 persons by 2040, an approximately 18 percent increase from the 2014 estimate. Housing in the City is estimated by SCAG to increase to 1,690,300 households by 2040, an approximately 27 percent increase from the 2014 estimate.[69]

Population

The Project's construction activities would create temporary construction-related jobs. In particular, most construction projects of this size and nature are completed in a timely manner and require specialized workers at various time frames, as needed, from the readily available local labor pool in the region. As a result, Project-related construction workers are not likely to relocate to the area as a consequence of working on the proposed Project.

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[68] *Southern California Association of Governments, Local Profiles Report 2015, Profile of the City of Los Angeles, May 2015, website: http://www.scag.ca.gov/Documents/LosAngeles.pdf, page 3, accessed: January 2016.*

[69] *Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategies, Demographics & Growth Forecast Appendix, Adopted April 2016, website: http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf, accessed: January 2017.*

Based on the most recent City estimates for the Palms-Mar Vista-Del Rey Community Plan Area, the average household size for multi-family dwelling units is 2.15 residents per unit.[70] The Project would include 129 multi-family residential units, which could generate approximately 277 residents (129 x 2.15). It should be noted that this estimate is highly conservative given that approximately 95 percent of the Project's dwelling units would be studio and one-bedroom units. The addition of 277 residents represents a 0.007 percent increase in resident population estimates for the City in 2014, and 0.006 percent of the estimated population in the City by 2040. This increase would not be considered a substantial increase for the area and is within the anticipated SCAG forecast for population. As such, population growth associated with the proposed Project would be less than significant and no mitigation measures are required.

Housing

With respect to housing, the Project would introduce 129 multi-family residential units to the area. These 129 multi-family residential units would represent a 0.009 percent increase in the overall estimated housing units for the City in 2014, and 0.008 percent of the estimated housing units for the City by 2040. This increase would not be considered a substantial increase in housing for the area as the addition of 129 new multi-family residential units is within the anticipated housing increases based on SCAG projections for housing. As such, housing growth associated with the proposed Project would be less than significant and no mitigation measures are required.

Infrastructure

The proposed Project would not require the extension of roadways or other infrastructure (e.g., water facilities, sewer facilities, electricity transmission lines, natural gas lines, etc.) into undeveloped areas. As a result, the development of the proposed Project would not indirectly induce population growth. Because the proposed Project is consistent with General Plan and the Palms-Mar Vista-Del Rey Community Plan, it would not introduce unplanned infrastructure not previously evaluated or anticipated in those plans. Therefore, impacts would be less than significant and no mitigation measures are required.

b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. For the purpose of this issue, a significant impact may occur if a project would result in the displacement of a substantial number of existing housing units, necessitating construction of replacement housing elsewhere.

The Project site is currently developed with commercial uses, and does not contain any existing housing. Therefore, development of the Project would not displace any existing housing and would not require construction of replacement housing. No impact would occur and no mitigation measures are required.

[70] *Los Angeles Department of City Planning, Demographic Research Unit, Population & Housing Data by Community Plan Area: Palms-Mar Vista-Del Rey Community Plan Area, 2009 Population Estimates, website: http://planning.lacity.org/DRU/Locl/LocRpt.cfm?geo=CP&sgo=CT, accessed: January 2016.*

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. For the purpose of this issue, a significant impact could occur if a project would result in the displacement of a substantial amount of existing residents, necessitating the construction of replacement housing elsewhere.

The Project site is currently developed with commercial uses, and does not contain any existing residents. Therefore, development of the Project would not displace any existing residents and would not require construction of replacement housing. No impact would occur and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the topics listed in the population and housing analysis above, including growth inducement, and housing and population displacement. The cumulative impacts study area for population and housing is the extent of the related projects.

Housing and population projections contained in the SCAG forecasts are based upon land uses designated in the General Plan. The related projects identified in Section II.5, Related Projects, of this IS/MND and other potential development projects that may occur throughout the City of Los Angeles subregion are expected to be largely consistent with their respective General Plan land use designations. Furthermore, SCAG periodically updates its projections for the various subregions that comprise the SCAG region, which allows these projections to be revised to reflect land use and planning changes that have occurred since previous updates. Accordingly, the effects of cumulative growth associated with the Project and other development within the City of Los Angeles subregion will be accommodated in SCAG forecasts over time and cumulative impacts with respect to housing and population growth would be less than significant and no mitigation measures are required.

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 objective for any of the following public services:

a) Fire protection?

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. LAFD considers fire protection services for a project to be adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.09.07-A, the maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles. If this distance is exceeded, all structures located in the applicable residential area would be required to install automatic fire sprinkler systems.

The Project would be served primarily by Fire Station No. 59, located at 11505 W. Olympic Boulevard, approximately 0.4 mile from the Project site.[71] Fire Station No. 59 includes an assessment engine, a paramedic rescue ambulance, one Emergency Medical Services (EMS) battalion captain, and a rehab air tender.[72] Fire Station No. 62, located at 11970 W. Venice Boulevard, approximately 2.3 miles from the Project site, would also serve the Project site. Fire Station No. 62 includes an assessment engine and a paramedic rescue ambulance. When fully staffed, Fire Station No. 59 contains seven full time staff and Fire Station No. 62 contains six full time staff.[73] Furthermore, based on response metrics from January through December, 2016, Fire Station No. 59 had an average response time for non-EMS calls of 5 minutes and 35 seconds, and 5 minutes and 34 seconds for EMS calls. For this same time period, Fire Station No. 62 had an average response time for non-EMS calls of 5 minutes and 39 seconds, and 5 minutes and 36 seconds for EMS calls.[74] Under national standards set forth by the National Fire Protection Association which have been adopted by LAFD, the response time goal is six minutes to nearly all medical emergencies.[75] Thus, under LAFD criteria, both the existing fire response distance from Fire Station No. 59 to the Project site and average response time to the Project site would be adequate.

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The required fire flow necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Pursuant to LAMC Section 57.507.3.1, City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any instance, a minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the required gpm is flowing. The overall fire flow requirement for the Project's development is 6,000-9,000 gpm from four fire hydrants flowing simultaneously with a residual water pressure of 20 PSI.[76] The adequacy of existing water pressure and availability in the Project area with respect to required fire flow would be confirmed by LAFD during the plan check review process. As part of the normal building permit process, the Project would be required to upgrade water service laterals, meters, and related devices, as applicable, in order to provide required fire flow; however, no new water facilities are anticipated. Moreover, such improvements would be conducted as part of the Project either on-site or off-site within the right-of-way, and as such, the construction activities would be temporary and not result in any significant environmental impacts.

Pursuant to LAMC Section 57.507.3.2, an approved fire hydrant must be located within 300 feet of every first story dwelling unit. The nearest fire hydrant to the Project site is near the southeast corner of Gateway Boulevard and Exposition Boulevard/Pico Boulevard. The entire Project Site in within 300 feet of this existing hydrant. Additional existing fire hydrants that would be within 300 feet of the Project site

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[71] *City of Los Angeles Department of City Planning, Fire and Police Stations Map, May 2015, website: http://planning.lacity.org/mapgallery/Image/Citywide/LAPD_LAFD.pdf, accessed: January 2016.*

[72] *City of Los Angeles Fire Department, Fire Station Directory, March 2014.*

[73] *Ibid.*

[74] *City of Los Angeles Fire Department, Fire Stat LA, website: http://www.lafd.org/fsla/stations-map, accessed January 2017.*

[75] *National Fire Protection Association, NFPA 1710: Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, website: http://www.nfpa.org/codes-and-standards/document-information-pages?mode=code&code=1710&DocNum=1710, accessed: March 2016.*

[76] *Correspondence from Robert Duff, Fire Inspector II, Los Angeles Fire Department, November 24, 2015. (Appendix G)*

include a hydrant at the southern corner of Colby Avenue and Gateway Boulevard, which covers the majority of the Project site within a 300-foot range; and a hydrant near the rear of the Project site at the northern terminus of Butler Avenue, which covers the entire Project site within a 300-foot range. Additional fire hydrants may be required, depending on the building design and LAFD requirements, as determined by LAFD; however, no new hydrants are anticipated. Such improvements would be conducted as part of the Project either on-site or off-site within the right-of-way under the City's B-Permit process. Construction activities to install any new pipes or pumping infrastructure would be temporary and in short duration and would not result in any significant environmental impacts.

Emergency vehicle access to the Project site would continue to be provided from local roadways (i.e., Gateway Boulevard, Colby Avenue, Butler Avenue, and Exposition Boulevard/Pico Boulevard). All improvements proposed would be in compliance with the Fire Code, including any additional access requirements of LAFD. Additionally, emergency access to the Project site would be maintained at all times during both Project construction and operation.

Therefore, for the reasons stated above, impacts related to adequate proximity to a fire station, fire flow, fire hydrants, and emergency access would be less than significant and no mitigation measures are required. Nonetheless, the following regulatory compliance measure is recommended.

Regulatory Compliance Measure

RCM 14-1. Prior to plan check review, the Project Applicant shall consult with the City of Los Angeles Fire Department regarding the installation of public and/or private fire hydrants, sprinklers, access, and/or other fire protection features within the Project. All required fire protection features shall be installed to the satisfaction of the City of Los Angeles Fire Department.

Cumulative Impacts

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the fire protection analysis above. The cumulative impacts study area for fire protection is the extent of the related projects in the LAFD service area.

Development of the Project in combination with the related projects would cumulatively increase the demand for fire protection services. Over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded fire station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and cumulative growth would contribute. Moreover, all of the cumulative development would be reviewed by LAFD in order to ensure adequate fire flow capabilities and adequate emergency access. Compliance with LAFD, City Building Code, and Fire Code requirements related to fire safety, access, and fire flow would ensure that cumulative impacts to fire protection would be less than significant and no mitigation measures are required.

b) Police protection?

Less Than Significant Impact. For the purpose of this issue, 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. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on police protection shall be made considering the following factors:

- The population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area;
- The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and
- Whether the project includes security and/or design features that would reduce the demand for police services.

The Project site is served by the West Los Angeles Community Police Station, which is located at 1663 Butler Avenue, approximately one mile from the Project site.[77] The West Los Angeles Community Police Station's boundaries include more than 228,000 people and cover 65 square miles, which, compared to LAPD's 17 other community police stations, is the largest is terms of area covered. The West Los Angeles Community Police Station is under the jurisdiction of LAPD's West Bureau.[78] The Project site is located in Reporting District 892.[79] The station currently has 225 sworn officers and 9 civilian staff representing an officer-to-population ratio of approximately 1,024 residents per officer.

Response time represents the period of time elapsed from the initiation of an assistance call to the appearance of a police unit at the scene. Calls for police assistance are prioritized based on the nature of the call. Unlike fire protection services, police units are most often in a mobile state; hence, actual distance between a headquarters facility and a given project site is of little relevance. Instead, the number of police officers out on the street is more directly related to the realized response time. LAPD has a preferred response time of seven minutes to emergency calls. The average response time to emergency calls for service for the West Los Angeles Community Police Station is approximately 7.7 minutes, which is slightly over the LAPD preferred response time of seven minutes.

Construction Impacts

Construction sites, if not properly managed, have the potential to attract criminal activity (such as trespassing, theft, and vandalism) and can become a distraction for local law enforcement from more pressing matters that require their attention. However, as required by the City as a regulatory compliance measure, the Project would employ construction safety features including erecting temporary fencing

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[77] *City of Los Angeles Department of City Planning, Fire and Police Stations Map, May 2015, website: http://planning.lacity.org/mapgallery/Image/Citywide/LAPD_LAFD.pdf, accessed: January 2016.*

[78] *City of Los Angeles Police Department, West Bureau, West Los Angeles Community Police Station, About West LA, website: http://www.lapdonline.org/west_la_community_police_station/content_basic_view/1630, accessed: January 2016.*

[79] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed: January 2016.*

along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to deter trespassing, vandalism, short-cut attractions, potential criminal activity, and other nuisances. Therefore, potential impacts to police protection services during the construction of the Project would be less than significant and no mitigation measures are required.

Regulatory Compliance Measure

RCM 14-2. Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to minimize trespassing, vandalism, short-cut attractions and other nuisances.

Operational Impacts

Operation of the Project could result in an on-site population of approximately 277 residents, albeit a highly conservative estimate, 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 increase as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. However, as required by the City as a regulatory compliance measure, the Project would implement principles of the City's Crime Prevention through Environmental Design Guidelines subject to the approval of LAPD prior to the issuance of building permits.[80] Specifically, the Project would include adequate and strategically positioned 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 Project would also include nighttime security lighting and secure parking facilities. Additionally, 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's 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 that LAPD would otherwise receive. In light of these features, it is anticipated that any increase in demands upon police protection services would be relatively low, and not necessitate the construction of a new police station, the construction of which may cause significant environmental impacts. Therefore, potential impacts to police protection services during the operation of the Project would be less than significant and no mitigation measures are required.

Regulatory Compliance Measure

RCM 14-3. The plans shall incorporate the design guidelines 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. Please refer to *Design Out Crime Guidelines: Crime Prevention Through Environmental Design* published by the City of Los Angeles Police Department's

[80] *City of Los Angeles Police Department, Crime Prevention Section, Design Out Crime Guidelines: Crime Prevention through Environmental Design, November 1997.*

Crime Prevention Section, (213) 485-3134. These measures shall be approved by the City of Police Department prior to the issuance of building permits.

Cumulative Impacts

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the police protection analysis above. The cumulative impacts study area for police protection is the extent of the related projects in the LAPD service area.

It is anticipated that the Project in combination with the related projects would increase the demand for police protection services. This cumulative increase in demand for police protection services would increase demand for additional LAPD staffing, equipment, and facilities over time. Similar to the Project, other projects served by LAPD would implement safety and security features according to LAPD recommendations. LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded police station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and cumulative growth would contribute. Therefore, the cumulative impact on police protection services would be less than significant and no mitigation measures are required.

c) Schools?

Less Than Significant Impact. For the purpose of this issue, 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). Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on public schools shall be made considering the following factors:

- The population increase resulting from a project, based on the net increase of residential units or square footage of non-residential floor area;
- 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 a project's proportional contribution to the demand;
- 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
- Whether a project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

The Project is in an area that is currently served by LAUSD public schools, as well as private schools and after-school programs. The Project would demolish the existing 14,594 square feet of commercial uses,

which are estimated to generate approximately 40 employees, and construct 129 multi-family residential units. As shown in Table III-17, compared to the existing uses, the Project is expected to increase the local student population by a net total of 82 students.

Table III-17
Student Generation

Land Use	Size	Elementary School Students[a]	Middle School Students[a]	High School Students[a]	Total Students
Project					
Multi-Family Residential Units	129 du	52	13	26	91
				Project Total	**91**
Existing Uses					
Commercial	40 emp[b]				9
				Project Net Total	**82**

Notes: du = dwelling units; emp = employees

[a] *Based on the following generation rate: 0.4 students/du for grades K-6, 0.1 students/du for grades 7-8, and 0.2 students/du for grades 9-12. Source: Los Angeles Unified School District, Developer Fee Justification Study, March 2014, pages 5, 15.*

[b] *Based on a generation rate of 0.00271 employees per square foot (14,594 x 0.00271). A by-grade breakdown is not provided for this generation rate. Source: Los Angeles Unified School District, Developer Fee Justification Study, March 2014.*

Source (table): EcoTierra Consulting, 2016.

The Project site is currently served by the following LAUSD schools:[81]

- Richland Avenue Elementary School (Grades K-6), located at 11562 Richland Avenue;
- Daniel Webster Middle School (Grades 7-8), located at 11330 W. Graham Place; and
- University Senior High School (Grades 9-12), located at 11800 Texas Avenue.

According to LAUSD, Daniel Webster Middle School is currently experiencing overcrowding with a shortage of 74 seats; however, when projecting capacity and enrollment in the next five years, LAUSD anticipates Daniel Webster Middle School will operate under capacity by 355 seats, and no longer be overcrowded, due to an increase in capacity at the school.[82] The addition of new middle school students generated by the Project would further exasperate the overcrowding at Daniel Webster Middle School; however, as noted, the current overcrowding at this school is anticipated to be rectified in the next five years. Thus, the potential impact would be temporary. LAUSD also noted that in the next five years, Richland Avenue Elementary School is anticipated to be overcrowded with a shortage of 12 seats.[83] The addition of new elementary school students generated by the Project would contribute to the projected overcrowded conditions at this school in the long-term. LAUSD did not identify existing or anticipated

[81] *Correspondence from Rena Perez, Director, Los Angeles Unified School District Facilities Services Division, November 30, 2015. (Appendix G)*

[82] *Ibid.*

[83] *Ibid.*

overcrowding issues with University Senior High School. Moreover, there are no schools planned to relieve known overcrowded.[84]

It should be noted that a State-mandated open enrollment policy enables students anywhere in LAUSD to apply to any regular, grade-appropriate LAUSD school with designated "open enrollment" seats. The number of open enrollment seats is determined annually. Each individual school is assessed based on the principal's knowledge of new housing and other demographic trends in the attendance area. Open enrollment seats are granted through an application process that is completed before the school year begins. Students living in a particular school's attendance area are not displaced by a student requesting an open enrollment transfer to that school.

To reduce any potential population growth impacts on public schools, the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district for the purpose of funding the construction or reconstruction of facilities (pursuant to California Education Code Section 17620(a)(1)). The Developer Fee Justification Study for LAUSD was prepared to support the school district's levy of the fees authorized by Section 17620 of the California Education Code.[85] The Project would be required to pay the appropriate fees, based on the square footage, to LAUSD.

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits, and subdivisions. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA or other State or local law. Therefore, as payment of appropriate school fees to LAUSD is required by law and considered full mitigation, impacts would be less than significant and no mitigation measures are required. To ensure compliance, the following regulatory compliance measure is recommended.

Regulatory Compliance Measure

RCM 14-4. 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 Applicant has paid all applicable school facility development fees in accordance with California Government Code Section 65995.

Cumulative Impacts

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the schools analysis above. The cumulative impacts study area for schools is the extent of the related projects and the attendance boundaries of the LAUSD schools that serve the Project site.

As discussed above, payment of developer impact fees in accordance with SB 50 and pursuant to Section 65995 of the California Government Code would ensure that the impacts of the Project on school facilities would be less than significant. Similar to the Project, the related projects would be required to pay school fees to the appropriate school district wherein their site is located. The payment of school fees would

[84] *Ibid.*

[85] *Los Angeles Unified School District, Developer Fee Justification Study, March 2014.*

fully mitigate any potential impacts to school facilities. Therefore, cumulative impacts would be less than significant and no mitigation measures are required.

d) Parks?

Less Than Significant Impact. For the purpose of this issue, 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. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on recreation and parks shall be made considering the following factors:

- The net population increase resulting from a project;
- The demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and a project's proportional contribution to the demand; and
- Whether a project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipal recreation and park facilities within the City. The following parks and recreational facilities were identified by LADRP as available to serve the Project site:[86]

Neighborhood Parks (between 1 and 10 acres in size) within a one-mile radius

- Mahood (Felicia) Multipurpose Center, a 4.32-acre park located at 11338 Santa Monica Boulevard
- Stoner Recreation Center, an 8.66-acre park located at 1835 Stoner Avenue

Community Parks (between 10 and 50 acres in size) within a two-mile radius

- Cheviot Hills Park and Recreation Center, a 40-acre park located at 2551 Motor Avenue
- Mar Vista Recreation Center, an 18.51-acre park located at 11430 Woodbine Avenue
- Venice Reservoir Site, a 14.35-acre park located at 3324 Centinela Avenue
- Westwood Park and Recreation Center, a 26.7-acre park located at 1350 S. Sepulveda Boulevard

Regional Parks (50+ acres in size) within a two-mile radius

- Penmar Golf Course, a 52.7-acre facility located at 1223 Rose Avenue
- Rancho Park Golf Course, a 140.14-acre facility located at 10460 Pico Boulevard

The Project would construct 129 multi-family residential units, which is estimated to generate approximately 277 residents. The Project is located in an area of the City that is below the City's standard for neighborhood and community park acreage. The City's standard ratio of neighborhood and

[86] *Correspondence from Michael Shull, General Manager, Planning, Construction, and Maintenance Branch, Los Angeles Department of Recreation and Parks, December 1, 2015. (Appendix G).*

community parks to population is 4 acres per 1,000 people as set forth in the Public Recreation Plan. The Palms-Mar Vista-Del Rey Community Plan Area has 0.38 acre of neighborhood and community park acreage per 1,000 people. The facilities in this area with active recreational features are very heavily used. While LADRP is currently in the process of implementing the 50 Parks Initiative, these are small pocket parks typically less than half an acre, often only one-tenth of an acre, and have a service radius of one-half mile. None of these planned parks will be sited within a half-mile of the Project site.[87]

Based on the standard minimum parkland-to-population ratio provided in the City's General Plan Framework Element (i.e., 2 acres per 1,000 residents), the proposed Project would generate a need for approximately 0.55 acre (approximately 23,958 square feet) of public parkland (neighborhood and community parks). Based on LADRP's long-range minimum parkland-to-population ratio provided in the Public Recreation Plan (i.e., 4 acres per 1,000 residents), the proposed Project would generate a need for approximately 1.11 acre (approximately 48,352 square feet) of public parkland. Specifically in the Palms-Mar Vista-Del Rey Community Plan Area, the Project's increase in on-site population would increase the demand on park and recreational facilities within an underserved area.

Consistent with the LADRP's recommended strategy to help alleviate the burden on existing park and recreational facilities, the proposed Project would provide recreational amenities and open space for Project residents, including a gym and central courtyard on the ground floor and a barbeque and bar, fire pit, lounge area, community garden on the rooftop as well as private decks. Approximately 17,766 square feet of open space would be provided on site. These recreational amenities would help relieve stress on the City's existing park system. The Project would result in an increase in the use of parks and recreational facilities that may not have the capacity to serve residents.[88] However, this impact would be reduced to a less than significant level through the required payment of Quimby fees for the construction of dwelling units. Quimby fees are assessed for the purpose of funding localized open space and recreational amenities.. Therefore, impacts would be less than significant and no mitigation measures are required. To ensure compliance, the following regulatory compliance measure is recommended.

Regulatory Compliance Measure

RCM 14-5. Pursuant to the Los Angeles Municipal Code, the Applicant shall pay the applicable Quimby fees for the construction of dwelling units.

Cumulative Impacts

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the parks analysis above. The cumulative impacts study area for parks is a one-mile radius from the Project site for neighborhood parks and a two-mile radius from the Project site for community and regional parks, which includes the eight facilities listed above.

As discussed above, the Project would result in a less than significant impact on parks and recreational facilities. Similar to the Project, the related projects in the area would be required to pay a Dwelling Unit Construction Tax or other similar purpose fees such as Quimby fees, as appropriate to the projects' location and proposed uses. The payment of fees would fully mitigate any potential impacts to park and

[87] *Ibid.*

[88] *Ibid.*

recreational facilities. Therefore, the cumulative impact would be less than significant and no mitigation measures are required.

e) Other public facilities?

Less Than Significant Impact. For the purpose of this issue, a significant impact may occur if a 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 a project site. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on libraries shall be made considering the following factors:

- The net population increase resulting from a project;
- The demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and
- Whether a project includes features that would reduce the demand for library services (e.g., library facilities or direct financial support to the Los Angeles Public Library).

Los Angeles Public Library (LAPL) provides library services to the City. Table III-18, Libraries Serving the Project Site, lists the libraries that were identified by LAPL as available to serve the Project:

Table III-18
Libraries Serving the Project Site

	West Los Angeles Regional Branch Library	Palms-Rancho Branch Library	Robertson Branch Library	Westwood Branch Library	Donald Bruce Kaufman-Brentwood Branch Library	Mar Vista Branch Library
Address	11360 Santa Monica Blvd	2920 Overland Ave	1719 S. Robertson Blvd	1246 Glendon Ave	11820 San Vicente Blvd	12006 Venice Blvd
Distance to Project Site	0.9 mile	1.3 miles	3.3 miles	1.7 miles	2.0 miles	2.0 miles
Facility Size	13,740 sf	10,500 sf	9,035 sf	12,500 sf	10,400 sf	12,500 sf
Collection Size and Circulation	46,774 volumes 73,035 circulation	55,074 volumes 212,971 circulation	45,234 volumes 156,396 circulation	62,426 volumes 209,375 circulation	47,171 volumes 114,945 circulation	51,858 volumes 199,395 circulation
Current Service Population	35,269	65,731	46,710	73,977	39,026	57,748
Full-time Staff	10.5	10	7.5	9	7.5	9.5
Adequate to Meet Demand?	Yes	Yes	Yes	Yes	Yes	Yes

sf = square feet

Source: Correspondence from Tom Jung, Management Analyst II, Business Office, Los Angeles Public Library, December 23, 2015. (Appendix G).

According to LAPL, these libraries that would serve the Project are adequately meeting current demand for library facilities, and there are no planned improvements to add capacity through expansion or develop

new libraries in the Project area.[89] Although the increase of approximately 277 residents that would occur with the development of the Project could increase demand for library materials, the increase in residential population would not result in a demand for new or expanded library facilities. The demand for library materials could be accommodated by the over six million books, audiobooks, periodicals, DVDs, and CDs throughout the LAPL system. The LAPL also offers many other services, including but not limited to, visual collections, e-media, web resources, research guides, and government document locator.

On February 8, 2007, the Board of Library Commissioners approved a Branch Facilities Plan. This Plan includes Criteria for New Libraries, which recommends new size standards for the provision of LAPL facilities – 12,500 square feet for community with less than 45,000 population and 14,500 square feet for community with more than 45,000 populations and up to 20,000 square feet for a Regional branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area.[90] While the updated Branch Facilities Plan provides general guidance on library facility improvements, no new development or renovation of library facilities is currently planned.

On March 8, 2011, City voters approved ballot Measure L, which amends the City Charter to incrementally increase the amount the City is required to dedicate annually from its General Fund to LAPL to an amount equal to 0.03 percent of the assessed value of all property in the City, and incrementally increase LAPL's responsibility for its direct and indirect costs until it pays for all of its direct and indirect costs. The measure was intended to provide 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. Beginning in fiscal year 2014-2015 and thereafter, LAPL was to be responsible for payment of all of its direct and indirect costs.[91]

Library funding is now mandated under the City Charter to be funded from property taxes including those assessed against the Project, which would increase with the new development and be utilized for additional staff, books, computers, and other library materials. Therefore, impacts to library facilities would be less than significant and no mitigation measures are required.

In addition to libraries, roadway improvements and/or dedications may be required by the Bureau of Engineering as part of the Project approval process. Required compliance with the Bureau of Engineering's requirements for street dedications and improvements would ensure that impacts associated with roadways would remain less than significant.

Cumulative Impacts

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the libraries analysis above. The cumulative impacts study area for libraries is the extent of the related projects and the service area of the libraries that serve the Project site.

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[89] *Correspondence from Tom Jung, Management Analyst II, Business Office, Los Angeles Public Library, December 23, 2015. (Appendix G).*

[90] *Ibid.*

[91] *Los Angeles Office of the City Clerk, Interdepartmental Correspondence and Attachments Regarding Measure L, website: http://clkrep.lacity.org/onlinedocs/2011/11-1100-S2_rpt_cao_11-16-10.pdf, accessed: January 2016.*

The related projects within the City and with a residential component could generate additional residents who could increase the demand upon library services. However, library funding is now mandated under the City Charter to be funded from property taxes including those assessed against the Project, which would increase with new development. The Project as well as the related projects within the City would be required to pay these fees as applicable. Therefore, the cumulative impact would be less than significant and no mitigation measures are required.

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. A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for park or recreational facilities that would exceed the capacity of existing parks and causes premature deterioration of the park facilities.

As discussed under threshold question 14.d), above, the Project would increase demand for parks and recreational facilities in the Project area, and the Palms-Mar Vista-Del Rey Community Plan Area is currently not meeting the standard minimum parkland-to-population ratio provided in the City's General Plan Framework Element (i.e., 2 acres per 1,000 residents) or in LADRP's long-range minimum parkland-to-population ratio provided in the Public Recreation Plan (i.e., 4 acres per 1,000 residents). However, this impact would be reduced to a less than significant level through the required payment of Quimby fees to the City for the construction of dwelling units (see RCM 14-5, above). Quimby fees are assessed to raise funds for localized open space and recreational facilities. Therefore, impacts would be less than significant and no mitigation measures are required.

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?

No Impact. For the purpose of this issue, a significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on recreation and parks shall be made considering the following factor:

- Whether a project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

The proposed Project would provide recreational amenities and open space for Project residents, including a gym and central courtyard on the ground floor and a barbeque and bar, fire pit, lounge area, community garden on the rooftop as well as private decks. Approximately 17,766 square feet of open space would be provided on site. These recreational amenities would be internal to the Project and would help relieve stress on the City's existing park and recreational system. The Project does not include, nor would it necessitate, a park or public recreational facility component, the construction of which could have an adverse environmental impact. Therefore, no impact would occur and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the recreational facilities analysis above. The cumulative impacts study area for recreational facilities is a one-mile radius from the Project site for neighborhood parks and a two-mile radius from the Project site for community and regional parks, which includes the eight facilities listed under threshold question 14.d), above.

As discussed above, the Project would result in a less than significant impact on parks and recreational facilities. Similar to the Project, the related projects in the area would be required to pay a Dwelling Unit Construction Tax or other similar purpose fees such as Quimby fees, as appropriate to the related projects' location and proposed uses. The payment of fees would fully mitigate any potential impacts to park and recreational facilities. Therefore, the cumulative impact would be less than significant and no mitigation measures are required.

16. TRANSPORTATION/TRAFFIC

The following analysis summarizes and incorporates by reference the information provided in the *Traffic Impact Analysis for a Residential Project Located at 11460-11484 Gateway Boulevard in the Palms-Mar Vista-Del Rey Area of the City of Los Angeles*, prepared by Overland Traffic Consultants, Inc., in January 2017 and updated in March 2017 (the "Traffic Report"). The Traffic Report is available as Appendix H to this IS/MND. LADOT issued an assessment report of the Traffic Report on March 22, 2017, accepting the findings of the Traffic Report, which is also available as Appendix H to this IS/MND.

a) Would the project conflict with 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. A significant impact may occur if a project were to result in substantial increases in traffic volumes in the vicinity of a project site such that the existing street capacity experiences a decrease in the existing volume to capacity ratios, or experiences increased traffic congestion exceeding LADOT's recommended level of service.

Methodology

The Traffic Report's impact analysis was conducted using the procedures set forth in the WLA TIMP and LADOT Traffic Studies Policies and Procedures (August 2014). A formal Memorandum of Understanding (MOU) was approved by LADOT for the Traffic Report, which is included as Appendix A to the Traffic Report. Additionally, as part of the MOU, screening criteria for the nearby Caltrans facilities were evaluated according to the requirements set forth in the agreement between the City and Caltrans District 7 (Freeway Impact Analysis Procedures, renewed December 2015).

A total of 11 study intersections were evaluated using LADOT Critical Movement Analysis (CMA) method. The CMA method uses a ratio of an intersection's traffic volume to its capacity for rating an intersection's congestion level. The highest combinations of conflicting traffic volume at an intersection are divided by the intersection capacity value. Intersection capacity represents the maximum volume of vehicles that have a reasonable expectation of passing through an intersection in one hour under typical traffic flow

conditions. This volume-to-capacity (V/C) ratio provides an ideal means for quantifying intersection operating characteristics. For example, if an intersection has a V/C value of 0.70, the intersection is operating at 70 percent capacity with 30 percent unused capacity. Once the V/C ratio has been calculated, operating characteristics are assigned an LOS grade (e.g., A through F) to estimate the level of congestion and stability of the traffic flow. Any change to the intersection's peak hour operation condition caused by an increase/decrease in traffic volume is quantified (i.e., traffic impact) using this analysis method. Table III-19, Level of Service Definitions, details the definitions of the LOS grades.

Table III-19
Level of Service Definitions

LOS	V/C Ratio	Operating Conditions
A	0.00-0.60	There are no cycles that are fully loaded, and few are even close to loaded. No approach phase is fully utilized by traffic and no vehicle waits longer than one red indication. Typically, the approach appears quite open, turning movements are easily made, and nearly all drivers find freedom of operation.
B	>0.60-0.70	Stable operation. An occasional approach phase is fully utilized and a substantial number are approaching full use. Many drivers begin to feel somewhat restricted with platoons of vehicles.
C	>0.70-0.80	Stable operation continues. Full signal cycle loading is still intermittent, but more frequent. Occasionally drivers may have to wait through more than one red signal indication, and back-ups may develop behind turning vehicles.
D	>0.80-0.90	A zone of increasing restriction, approaching instability. Delays to approaching vehicles may be substantial during short peaks within the peak period, but enough cycles with lower demand occur to permit periodic clearance of developing queues, thus preventing excessive back-ups.
E	>0.90-1.00	Represents the most vehicles that any particular intersection approach can accommodate. At capacity (V/C = 1.00) there may be long queues of vehicles waiting upstream of the intersection and delays may be great (up to several signal cycles).
F	>1.00	Represents jammed conditions. Back-ups from location downstream or on the cross street may restrict or prevent movement of vehicles out of the approach under consideration; hence, volumes carried are not predictable. V/C values are highly variable, because full utilization of the approach may be prevented by outside conditions.

Source: Overland Traffic Consultants, 2017.

Reductions for traffic signal improvements in the area are included in the Traffic Report analysis. The area currently has Automated Traffic Surveillance and Control (ATSAC) systems improvements which increase capacity at the intersection through computer aided signal progression. The City has determined that this type of improvement increases capacity by approximately seven percent. The City has supplemented the ATSAC system in the West Los Angeles area with an Adaptive Traffic Control System (ATCS), which includes advance loop detection with system-wide interaction between the traffic signals. An additional three percent capacity increase is estimated with this signal system. According to LADOT, the West Los Angeles area has been improved with the ATSAC system, which includes the study intersections. The existing conditions include the ATSAC system, and the future conditions (with and without the Project) include ATSAC and ATCS improvements at the study intersections.

The West Los Angeles area of the City has been observed to experience delays in traffic when through and turning movements are impeded by traffic stopped for upstream traffic signals or from high pedestrian volumes. When traffic counts are taken at the study intersections, only those that make it through the intersection's green cycles are counted. In order to account for the delay at the study intersections, the 7 percent and 10 percent increases in capacity credits for signal improvements have been removed during the AM and PM peak hours. Furthermore, as the Project is located within the WLA TIMP Specific Plan

area, the Traffic Report takes into account if any potential impacts from the Project exceed limits established by the WLA TIMP.

The Traffic Report analyzed the following traffic conditions:

- Existing[92]
- Existing + Project
- Existing + Project + Improvements (if necessary)
- Existing + Ambient Growth[93]
- Existing + Ambient Growth + Related Projects[94]
- Existing + Ambient Growth + Related Projects + Project
- Existing + Ambient Growth + Related Projects + Project + Improvements (if necessary)

According to the standards adopted by LADOT and described in the WLA TIMP, a traffic impact is considered significant if the related increase in the V/C value equals or exceeds the thresholds shown in Table III-20, City of Los Angeles Significant Impact Criteria.

Table III-20
City of Los Angeles Significant Impact Criteria

LOS	Final V/C Value	Increase in V/C Value
C	0.701 – 0.800	+0.040
D	0.801 – 0.900	+0.020
E & F	>0.901	+0.010 or more

Note: No significant impacts occur at LOS A or LOS B because intersection operations are satisfactory and can accommodate additional traffic growth.

Source: Overland Traffic Consultants, 2017.

The study intersections analyzed in the Traffic Report include the following. The locations and existing geometrics of these study intersections in relation to the Project site are shown on Figure III-3, Study Intersection Characteristics.

1. Bundy Drive & Pico Boulevard
2. Barrington Avenue & Olympic Boulevard
3. Barrington Avenue & Pico Boulevard
4. Barrington Avenue & Gateway Boulevard

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[92] *To establish the existing conditions, traffic counts were conducted on November 3, 2015, May 24, 2016, October 25, 2016, and January 18, 2017. Counts conducted prior to 2016 were increased by one percent per year to account for ambient growth.*

[93] *Ambient growth to 2020 (the Project's build-out year) with additional 1 percent per year to account for ambient growth.*

[94] *"Related Projects" includes the potential construction of the 29 other land development projects in the general vicinity of the Project site (see Table II-5, List of Related Projects, in Section II, Project Description).*

5. Barrington Avenue & National Boulevard
6. Gateway Boulevard & Pico Boulevard
7. Sawtelle Boulevard & Olympic Boulevard
8. Sawtelle Boulevard & Tennessee Avenue/Southbound I-405 Off-Ramp
9. Sawtelle Boulevard & Pico Boulevard;
10. Exposition Boulevard and Sawtelle Boulevard; and
11. Sepulveda Boulevard & Pico Boulevard

Upon discussion with LADOT, capacity was further reduced at study intersections in the following manner to account for delay:

- The installed ATCS credit was not incorporated for the following study intersections during the AM and PM peak hours, thus demonstrating a three percent decrease in capacity:
    - 1. Bundy Drive & Pico Boulevard
    - 7. Sawtelle Boulevard & Olympic Boulevard
- The installed ATSAC and ATCS credit was not incorporated for the following study intersections during the AM and PM peak hours, thus demonstrating a 10 percent decrease in capacity:
    - 2. Barrington Avenue & Olympic Boulevard
    - 3. Barrington Avenue & Pico Boulevard
    - 6. Gateway Boulevard & Pico Boulevard
    - 8. Sawtelle Boulevard & Tennessee Avenue/Southbound I-405 Off-Ramp
    - 9. Sawtelle Boulevard & Pico Boulevard
    - 11. Sepulveda Boulevard & Pico Boulevard

It should be noted that because the Project would remove the existing commercial uses at the site and construct multi-family residential uses, a neighborhood street segment analysis is not required pursuant to LADOT guidelines.

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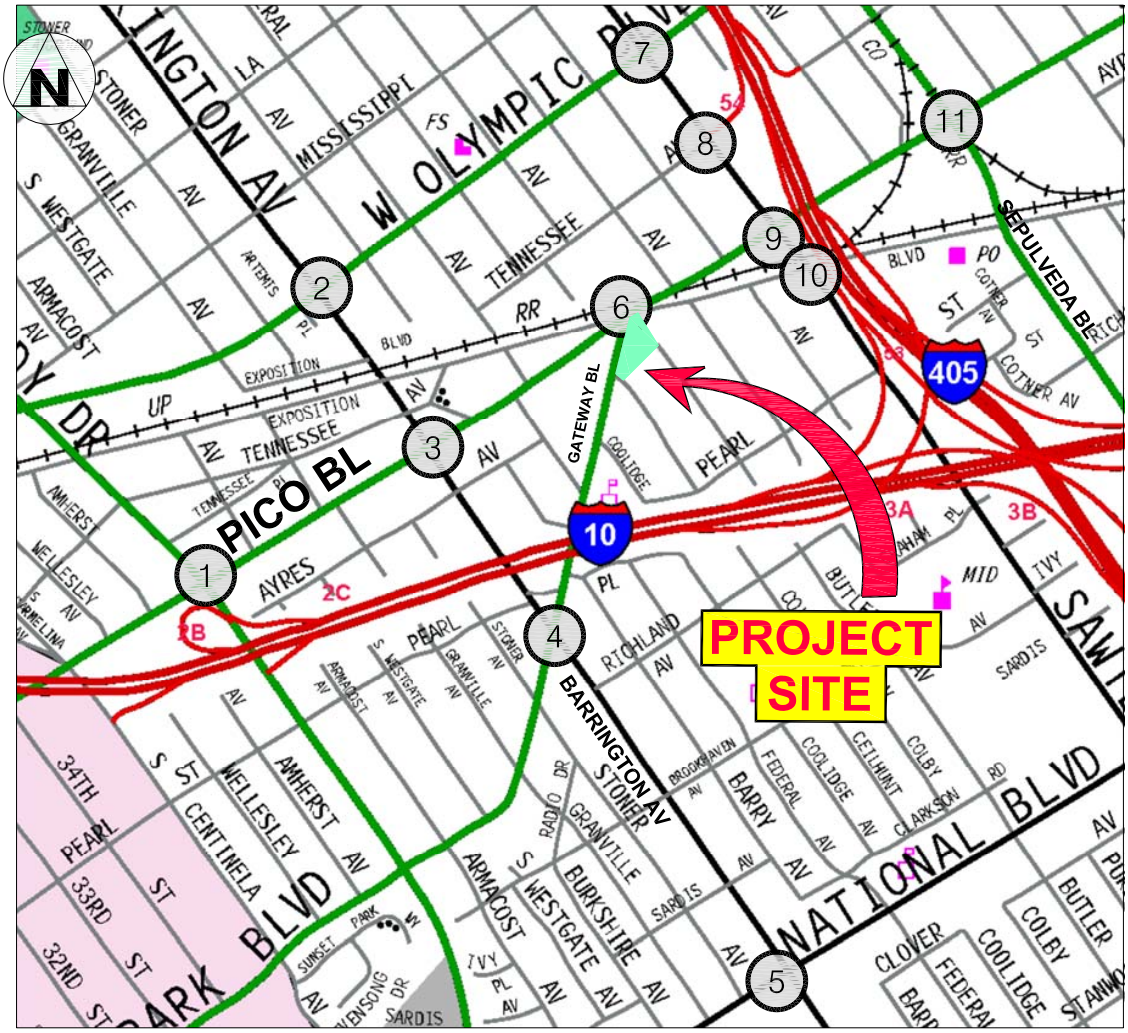
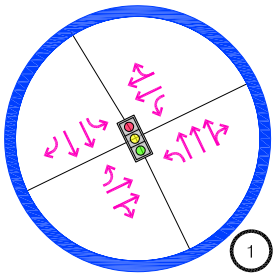
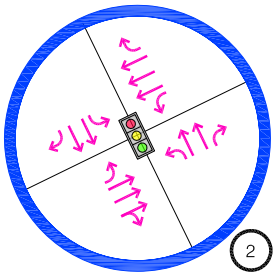
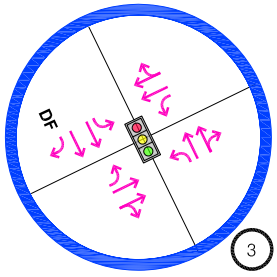




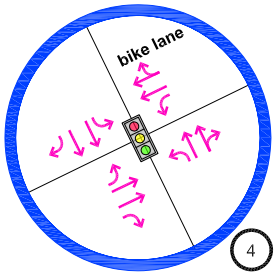
BUNDY DRIVE &
PICO BOULEVARD



BARRINGTON AVENUE &
OLYMPIC BOULEVARD



BARRINGTON AVENUE &
PICO BOULEVARD



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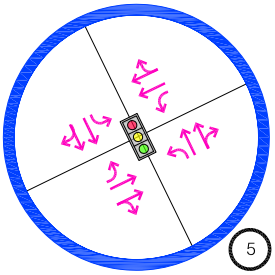
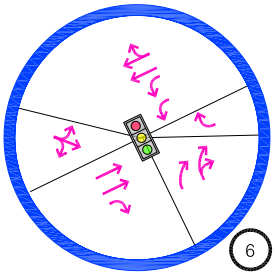
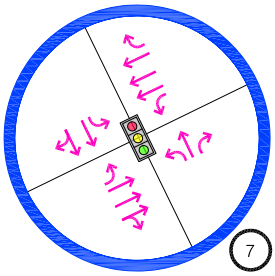
GATEWAY BOULEVARD



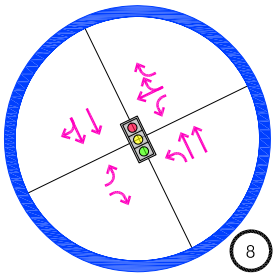
BARRINGTON AVENUE &
NATIONAL BOULEVARD



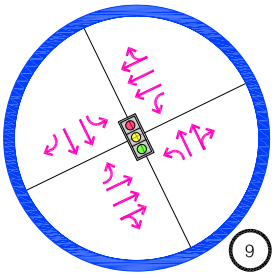
GATEWAY BOULEVARD &
PICO BL/EXPOSITON BL



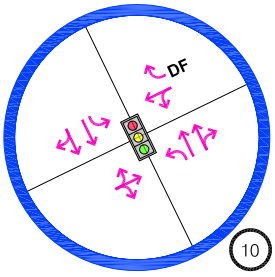
SAWTELLE BOULEVARD &
OLYMPIC BOULEVARD



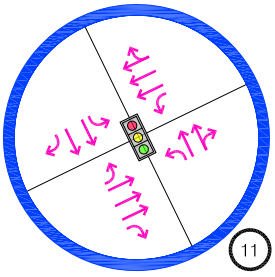
SAWTELLE BOULEVARD &
TENNESSEE AV/SB 405 FWY OFFRAMP



SAWTELLE BOULEVARD &
PICO BOULEVARD



SAWTELLE BOULEVARD &
EXPOSITION BOULEVARD



SEPULVEDA BOULEVARD &
PICO BOULEVARD

Source: Overland Traffic Consultants, Inc., March 2017.

Project Traffic Characteristics

Trip Generation

Trip-generating characteristics of the existing land uses as well as the uses proposed by the Project are shown in Table III-21, Trip Generation Rates. The trip generations are based on the Institute of Transportation Engineers' (ITE) Trip Generation Manual (9th Edition), which is the industry standards for estimating traffic generation for different land uses. However, the PM peak hour trip generations are based on the WLA TIMP, rather than the ITE, as required by LADOT methodology within the WLA TIMP area.

Table III-21
Trip Generation Rates

Land Use	ITE Code	Daily Trips	AM Peak Hour			WLA TIMP PM Peak Hour		
			Total	In	Out	Total	In	Out
Apartment	220	6.65	0.51	20%	80%	0.49	65%	35%
Condominium	230	5.81	0.44	17%	83%	0.55	67%	33%
Other Retail[a]	826	44.32	6.84	48%	52%	9.60	44%	56%
Tire Store	848	24.87	2.89	63%	37%	5.13	43%	57%
High Turnover Restaurant	932	127.15	10.81	55%	45%	12.92	60%	40%
Vehicle Repair Services[b]	942	20.00	2.25	66%	34%	2.87	48%	52%

Note: Rate for housing land uses is per dwelling unit; rate for all other land uses are per 1,000 square feet

[a] *"Other Retail" includes high trip-generating retail such as dry cleaners, coffee shops, etc.*

[b] *No ITE daily trip rate for vehicle repair services, San Diego Association of Governments' daily trip rate for this land use is used instead.*

Source: Overland Traffic Consultants, 2017.

The ITE daily trip generation rate for apartments has a higher daily trip and AM peak hour rate than the daily trip and AM peak hour rate for condominiums. However, the WLA TIMP trip generation rate for condominiums in higher in the PM peak hour than the rate for apartments. While the Project's residential units would be subdivided for residential condominiums, units may be rented as apartments initially. Thus to provide a conservative analysis, the ITE trip generation rate for apartments was used for the daily trips and AM peak hour, and the ITE trip generation rate for condominiums was used for the PM peak hour in the Traffic Report analysis.

The trip generation rates are general in application and are established without regard for the nature of a specific project's vicinity in terms of transit and walking or interaction with the traffic on the surrounding roadways. Considering the Metro Expo Line, Big Blue Bus, and other transit opportunities in the area, walkability and expanding cycling infrastructure in the City and the Project site's vicinity, it is anticipated that residents would make use of these options instead of single-occupant vehicles. A transit trip reduction was not incorporated into this analysis so as to present a conservative estimate of Project impacts.

Since many land uses are visited on the way to or from another main destination point, LADOT has established pass-by credit for several land uses, which are set forth in LADOT's Traffic Studies Policies and Procedures (August 2014). A pass-by reduction for the existing uses include a 10 percent reduction for the retail component, 20 percent reduction for the restaurant, and 50 percent for the dry cleaner. This

pass-by credit reduces the number of trips credited to the existing uses thereby providing a more conservative estimate of net Project trips. Table III-22, Estimated Project Trip Generation, shows the estimated trip generation for the proposed Project. As shown, it is estimated that the Project would conservatively generate a net increase of 455 daily trips with 24 AM peak hour trips and 12 PM peak hour trips after reductions for the existing uses to be removed, internal trips, and pass-by trips.

Table III-22
Estimated Project Trip Generation

ITE Code	Land Use	Size	Daily Traffic	AM Peak Hour			PM Peak Hour		
				Total	In	Out	Total	In	Out
Proposed Project									
220/230	Residential	129 du	858	66	13	53	71	48	23
Existing Uses (to be removed)									
852	Vehicle Repair Services[a]	7,586 sf	152	17	11	6	22	11	11
	Pass-by Trips	10%	*(15)*	*(2)*	*(1)*	*(1)*	*(2)*	*(1)*	*(1)*
	Subtotal Vehicle Repair	--	137	15	10	5	20	10	10
848	Tire Store	3,848 sf	96	11	7	4	20	9	11
	Pass-by Trips	10%	*(10)*	*(1)*	*(1)*	*(0)*	*(2)*	*(1)*	*(1)*
	Subtotal Tire Store	--	86	10	6	4	18	8	10
932	Restaurant	1,770 sf	225	19	10	9	23	14	9
	Internal Trips	10%	*(23)*	*(2)*	*(1)*	*(1)*	*(2)*	*(1)*	*(1)*
	Pass-by Trips	20%	*(50)*	*(4)*	*(2)*	*(2)*	*(5)*	*(3)*	*(2)*
	Subtotal Restaurant	--	153	13	7	6	16	10	6
826	Dry Cleaner	1,390 sf	62	10	5	5	13	6	7
	Internal Trips	5%	*(3)*	*(1)*	*(1)*	*(0)*	*(1)*	*(0)*	*(1)*
	Pass-by Trips	50%	*(33)*	*(5)*	*(2)*	*(3)*	*(7)*	*(3)*	*(4)*
	Subtotal Specialty Retail	--	26	4	2	2	5	3	2
	Total Existing	**14,594 sf**	**403**	**42**	**25**	**17**	**59**	**31**	**28**
	Net Total Trips	**--**	**455**	**24**	***(12)***	**36**	**12**	**17**	***(5)***

du = dwelling units; sf = square feet

[a] *Accounts for the five auto repair services and the smog check station uses on site.*

Source: Overland Traffic Consultants, 2017.

Trip Distribution and Assignment

A primary factor affecting the direction of trips is the spatial distribution between destination points which would generate trip origins and destinations. The estimated directional trip distribution is also based on the study area roadway network, freeway locations, and traffic flow patterns in and out of this area of the City and consistency with previously approved traffic studies for this area. Figure III-4, Overall Project Distribution, illustrates the estimated area-wide Project traffic distribution percentages. Figure III-5, Project Distribution at Study Intersections, illustrates the estimated Project traffic percentages at each of the study intersections; and Figure III-6, Existing Uses Trip Distribution Percentages, illustrates the estimated existing site traffic distribution. Using the traffic assignment at each study intersection and the estimated peak hour traffic volume shown in Table III-22, the Project's peak hour traffic volumes at each study intersection have been calculated and are shown in Figure III-7, Project Trips Only (AM Peak Hour /

PM Peak Hour). This estimated assignment of the Project traffic flow provides the information necessary to analyze the potential traffic impacts generated by the Project at the study intersections.

Existing Transportation Setting

The Project area is within an area served by the San Diego Freeway (I-405) and the Santa Monica Freeway (I-10). The regional north-south I-405 freeway is located to east of the Project. The San Diego Freeway is accessible from the project area via Tennessee Avenue/Sawtelle Boulevard, Cotner Avenue, and National Boulevard. The freeway is approximately one quarter of a mile east of the Project site. The San Diego Freeway (I-405) carries approximately 314,000 vehicles per day (VPD) with 21,700 vehicles per hour (VPH) near the junction with the Santa Monica Freeway during peak periods. The Santa Monica Freeway (I-10) is an east-west freeway located south of the Project site. The Santa Monica Freeway is accessible from the Project area via Bundy Drive and National Boulevard/National Place. The Santa Monica Freeway is located approximately one quarter mile south of the Project site and carries approximately 244,000 VPD with 16,500 VPH near the junction with the San Diego Freeway during the peak periods. The San Diego Freeway and Santa Monica Freeway link to numerous other freeways in the vicinity providing extensive regional access.

Barrington Avenue is a north-south roadway designated as an Avenue I southeast of Pico Boulevard and as an Avenue II northwest of Pico Boulevard in the Mobility Plan 2035. Two lanes in each direction are provided in the Project area.

Bundy Drive is a north-south roadway designated as an Avenue I in the Mobility Plan 2035. Two lanes in each direction are provided in the Project area.

Butler Avenue is a northwest-southeast roadway designated as a local street in the Mobility Plan 2035. Butler Avenue is a discontinuous roadway in the Project area with one lane in each direction. The roadway currently connects to Exposition Boulevard and its terminus, but is closed to through traffic to and from Butler Avenue.

Colby Avenue is a northwest-southeast roadway designated as a local street in the Mobility Plan 2035. Colby Avenue is a discontinuous roadway in the Project area with one lane in each direction. The roadway provides the southwest boundary of the Project site.

Exposition Avenue is an east-west roadway designated as a local street in the immediate Project area. Westbound Exposition Avenue traffic is required to make right turns only at Pico Boulevard.

National Boulevard is an east-west roadway designated as an Avenue I in the Mobility Plan 2035. The roadway provides two lanes in each direction in the Project area.

Sawtelle Boulevard is a north-south roadway designated as an Avenue I south of Olympic Boulevard and as a collector roadway north of Olympic Boulevard in the Mobility Plan 2035.

Sepulveda Boulevard is a north-south roadway that extends from the South Bay to the north San Fernando Valley. The roadway is designated as a Boulevard II in the Mobility Plan 2035 and provides two lanes in each direction in the Project area.

Tennessee Avenue is an east-west roadway that extends from Coral Avenue to Sawtelle Boulevard in the Project area. The east leg of the roadway is the San Diego Freeway southbound off ramp. Tennessee Avenue is designated as a collector street in the Project area in the Mobility Plan 2035.

Olympic Boulevard is an east-west roadway designated as a Boulevard II in the Mobility Plan 2035. West of Centinela Avenue, Olympic Boulevard is within the City of Santa Monica jurisdiction. Three lanes in each direction are provided in the Project area.

Pico Boulevard is an east-west roadway designated as an Avenue I in the City of Los Angeles Mobility Plan 2035. West of Centinela Avenue, Olympic Boulevard is within the City of Santa Monica jurisdiction. Two lanes in each direction are provided in the Project area.

Traffic Conditions Analysis

Existing Conditions

As mentioned above, the traffic condition analysis was conducted using the CMA method. By applying the CMA procedures to the intersection data, the V/C values and the corresponding LOS for existing traffic conditions were determined at the study intersections. Table III-23, Existing (2016) Conditions LOS, summarizes the LOS values at the study intersections. Supporting capacity worksheets are contained in Appendix I of the Traffic Report (see Appendix H to this IS/MND). Figures III-8 and III-9, Existing (2016) Traffic Volumes, illustrate the traffic volumes in the AM and PM peak hours, respectively.

Table III-23
Existing (2016) Conditions LOS

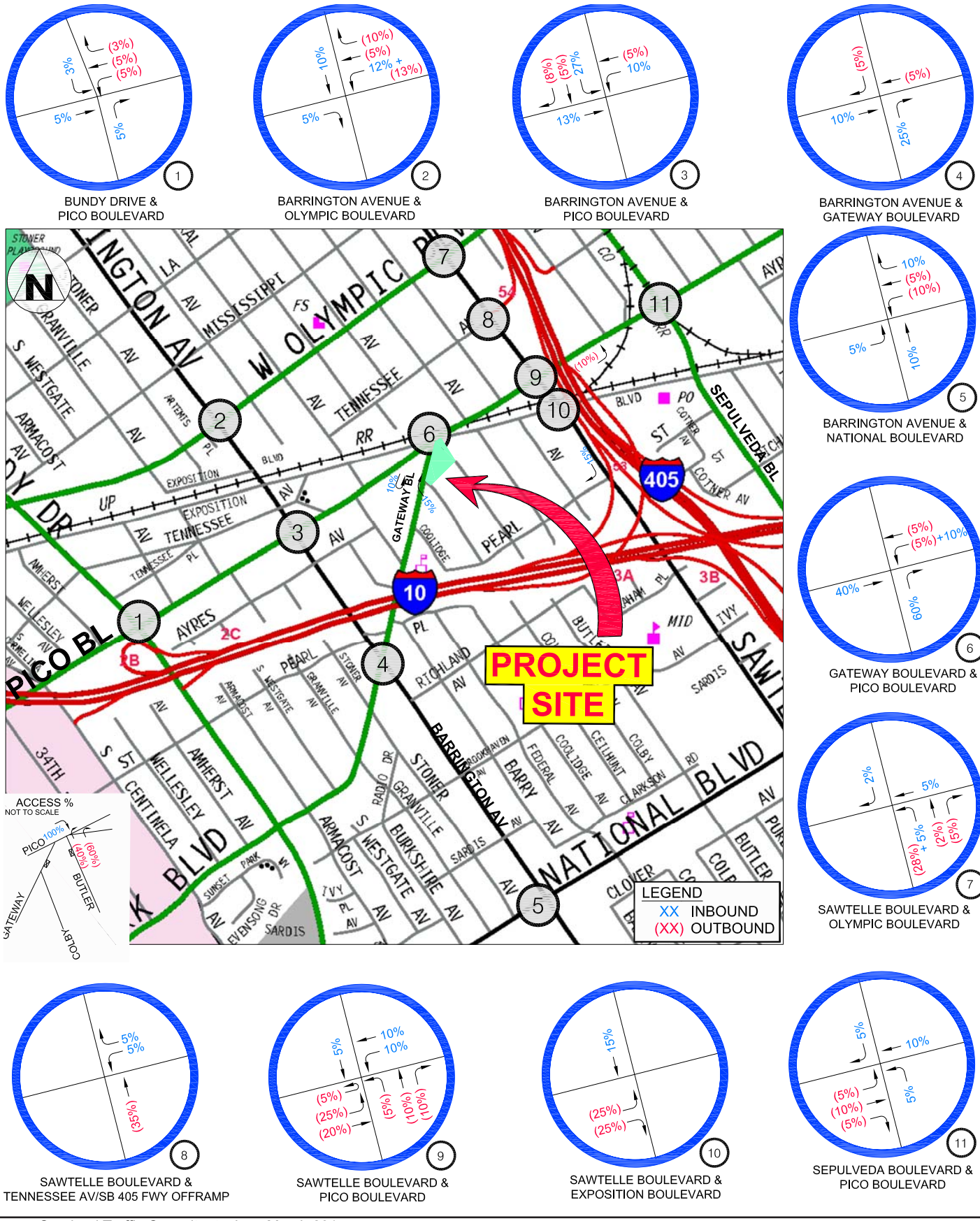
No.	Intersection	Peak Hour	Existing	
			CMA	LOS
1	Bundy Drive & Pico Boulevard	AM	1.001	F
		PM	0.953	E
2	Barrington Avenue & Olympic Boulevard	AM	0.949	E
		PM	0.796	C
3	Barrington Avenue & Pico Boulevard	AM	0.950	E
		PM	0.965	E
4	Barrington Avenue & Gateway Boulevard	AM	0.833	D
		PM	0.871	D
5	Barrington Avenue & National Boulevard	AM	0.880	D
		PM	0.802	D
6	Gateway Boulevard & Pico Boulevard	AM	1.009	F
		PM	1.010	F
7	Sawtelle Boulevard & Olympic Boulevard	AM	0.849	D
		PM	0.886	D
8	Sawtelle Boulevard & Tennessee Avenue/Southbound I-405 Off-Ramp	AM	0.556	A
		PM	0.830	D
9	Sawtelle Boulevard & Pico Boulevard	AM	1.009	F
		PM	1.063	F
10	Exposition Boulevard & Sawtelle Boulevard	AM	0.494	A
		PM	0.826	D
11	Sepulveda Boulevard & Pico Boulevard	AM	0.938	E
		PM	0.942	E

Source: Overland Traffic Consultants, 2017.

Source: Overland Traffic Consultants, Inc., December 2016.

EcoTierra consulting

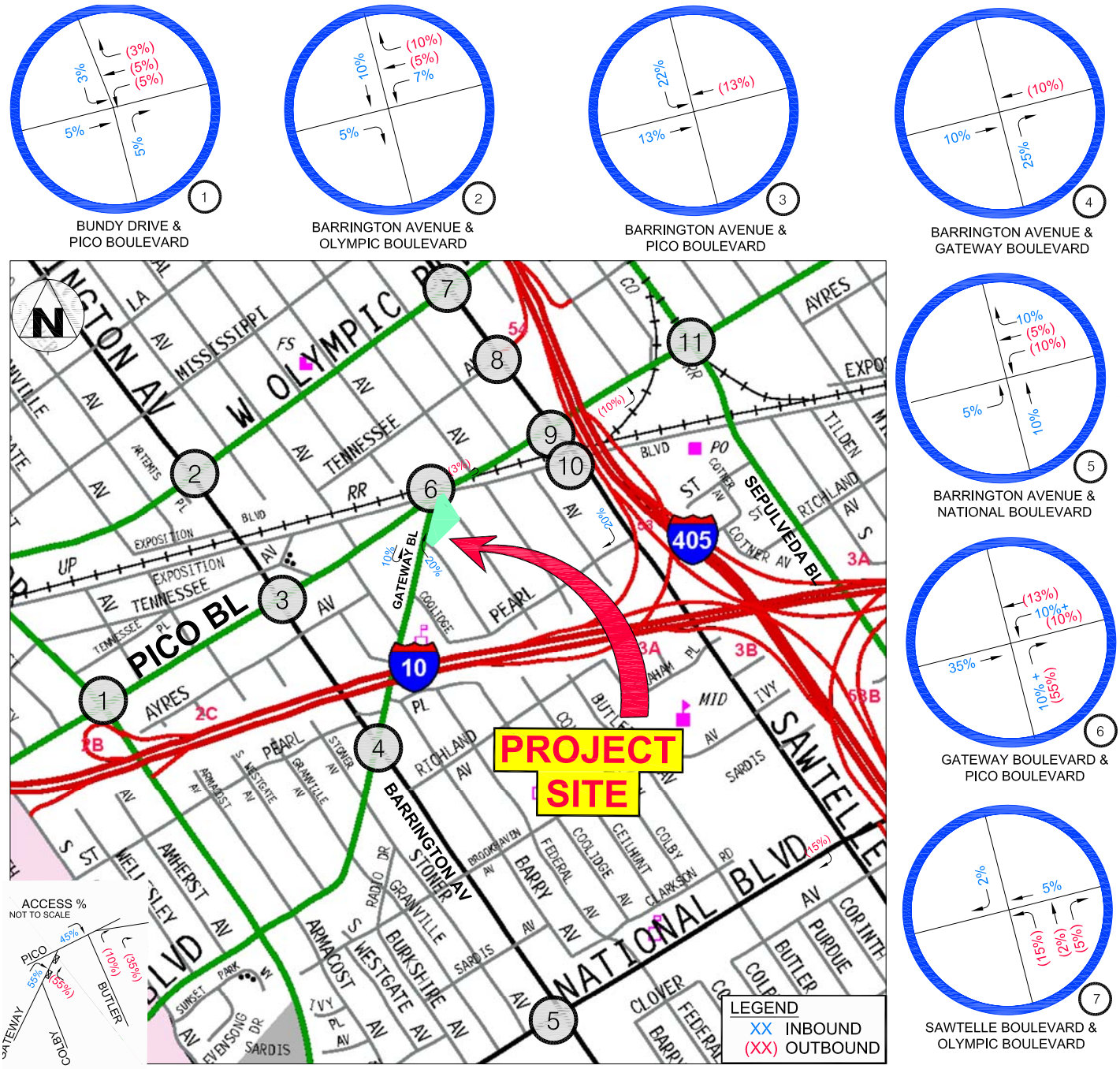
Figure III-4
Overall Project Distribution



Source: Overland Traffic Consultants, Inc., March 2017.

EcoTierra consulting

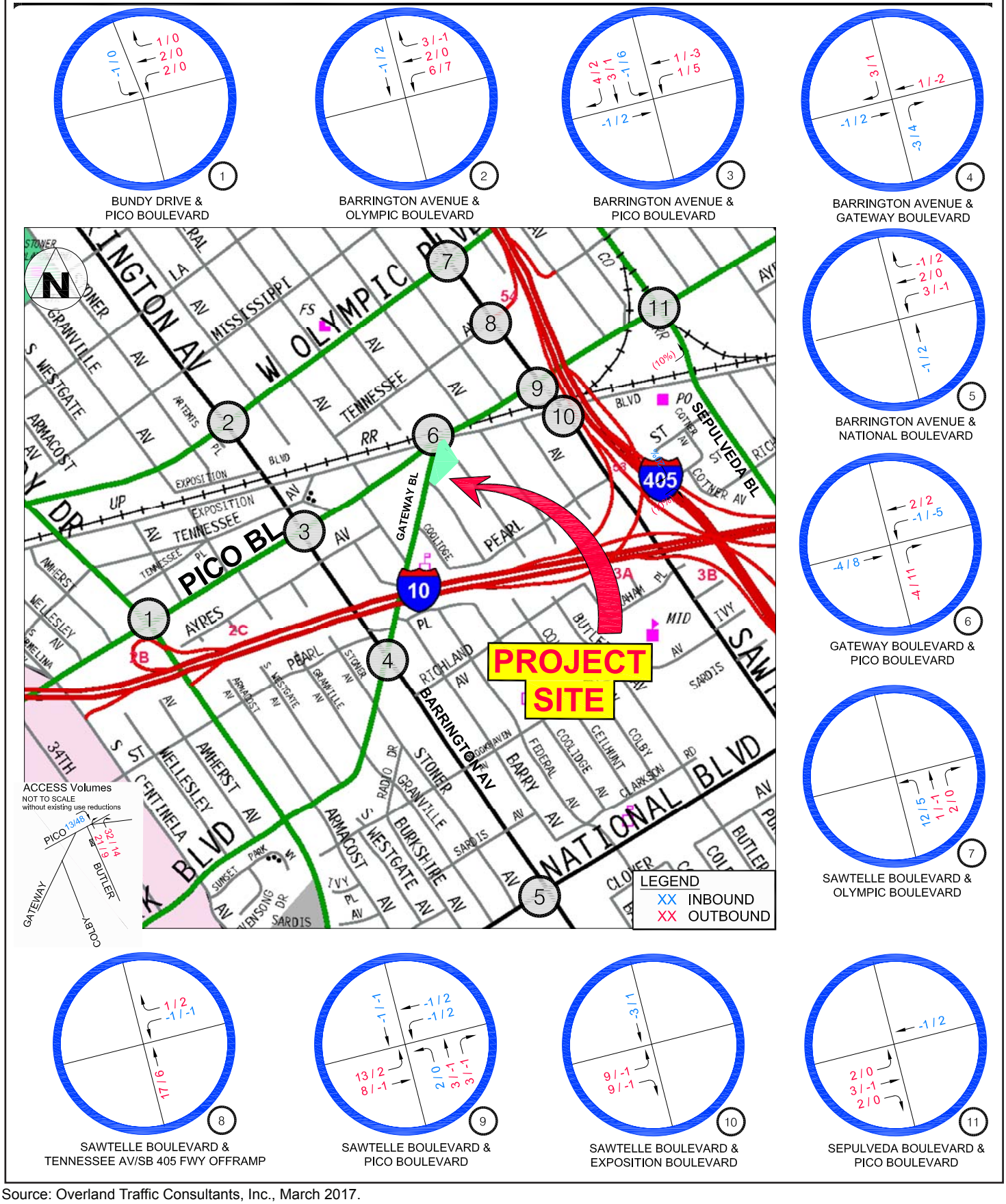
Figure III-5
Project Distribution at Study Intersections



Source: Overland Traffic Consultants, Inc., March 2017.

EcoTierra consulting

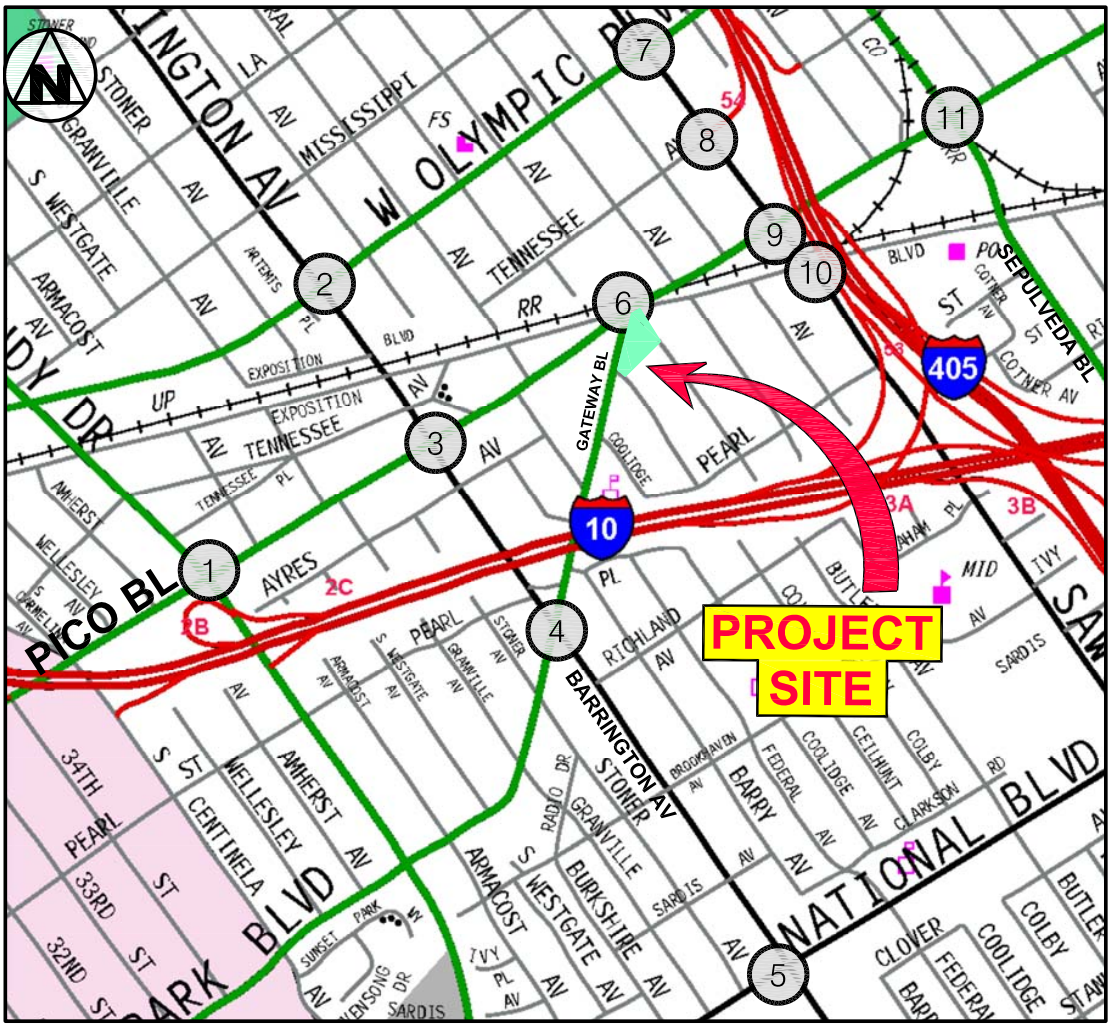
Figure III-6
Existing Uses Trip Distribution Percentages

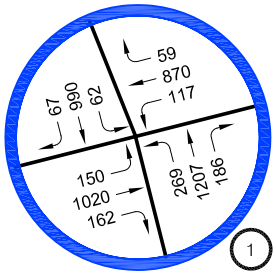


Source: Overland Traffic Consultants, Inc., March 2017.

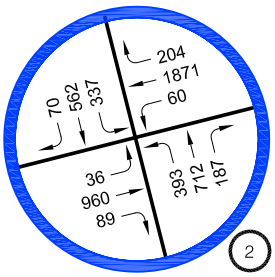
EcoTierra consulting

Figure III-7
Project Trips Only (AM Peak Hour / PM Peak Hour)

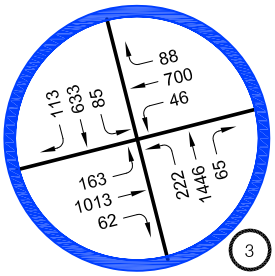




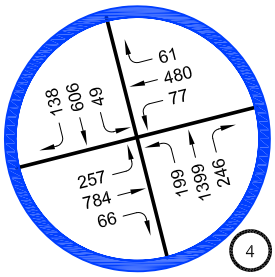
BUNDY DRIVE & PICO BOULEVARD



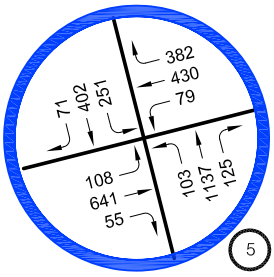
BARRINGTON AVENUE & OLYMPIC BOULEVARD



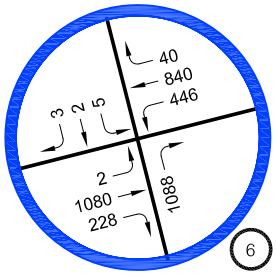
BARRINGTON AVENUE & PICO BOULEVARD



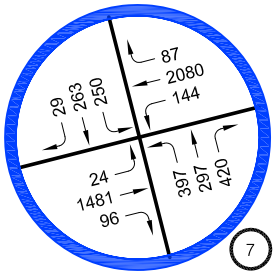
BARRINGTON AVENUE & GATEWAY BOULEVARD



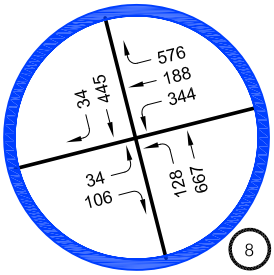
BARRINGTON AVENUE & NATIONAL BOULEVARD



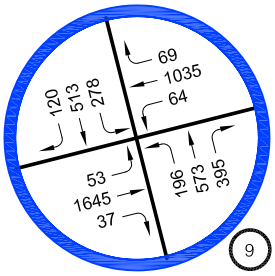
GATEWAY BOULEVARD & PICO BOULEVARD



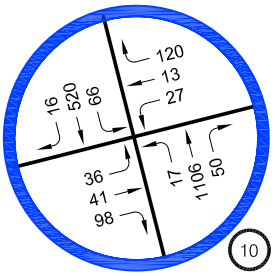
SAWTELLE BOULEVARD & OLYMPIC BOULEVARD



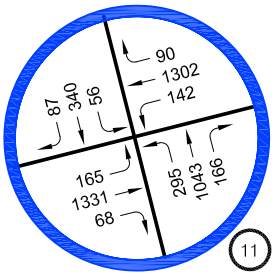
SAWTELLE BOULEVARD & TENNESSEE AV/SB 405 FWY OFFRAMP



SAWTELLE BOULEVARD & PICO BOULEVARD



SAWTELLE BOULEVARD & EXPOSITION BOULEVARD

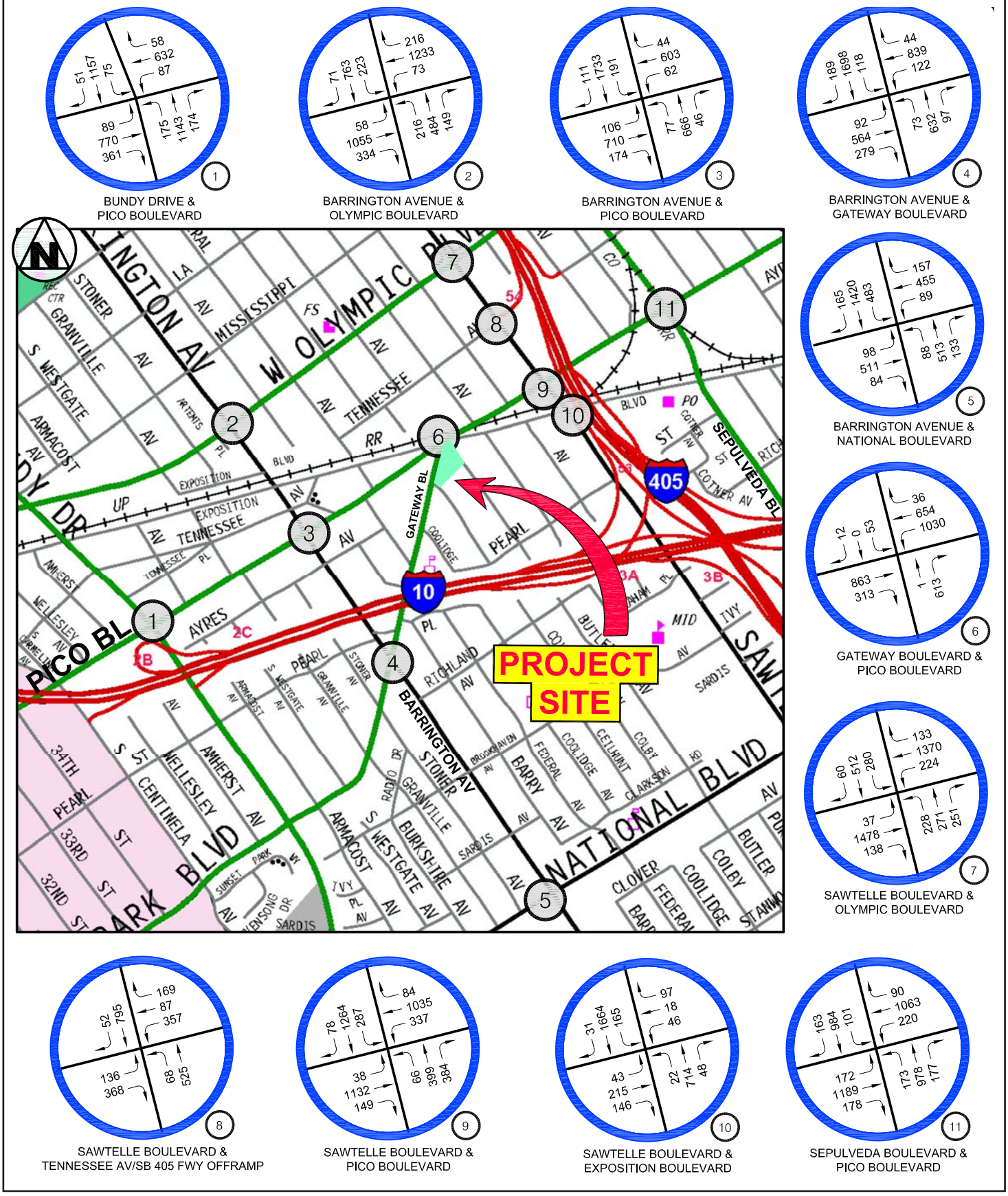


SEPULVEDA BOULEVARD & PICO BOULEVARD

Source: Overland Traffic Consultants, Inc., December 2016.

EcoTierra consulting

Figure III-8
Existing (2016) Traffic Volumes – AM Peak Hour



Source: Overland Traffic Consultants, Inc., December 2016.

Existing + Project Conditions

The potential impact for existing plus Project was conducted by adding the Project traffic to the existing traffic. The existing conditions and the existing plus Project conditions were compared to determine if the thresholds of significance in Table III-20, see above, were exceeded. Table III-24, Existing (2016) + Project Conditions LOS, summarizes the LOS values at the study intersections with Project traffic. As shown, no significant impacts would result in the existing plus Project condition.

Table III-24
Existing (2016) + Project Conditions LOS

No.	Intersection	Peak Hour	Existing		Existing + Project			Significant Impact?
			CMA	LOS	CMA	LOS	Change	
1	Bundy Drive & Pico Boulevard	AM	1.001	F	1.002	F	+0.001	NO
		PM	0.953	E	0.953	E	0.000	NO
2	Barrington Avenue & Olympic Boulevard	AM	0.949	E	0.949	E	0.000	NO
		PM	0.796	C	0.801	D	+0.005	NO
3	Barrington Avenue & Pico Boulevard	AM	0.950	E	0.949	E	*(0.001)*	NO
		PM	0.965	E	0.969	E	+0.004	NO
4	Barrington Avenue & Gateway Boulevard	AM	0.833	D	0.832	D	*(0.001)*	NO
		PM	0.871	D	0.870	D	*(0.001)*	NO
5	Barrington Avenue & National Boulevard	AM	0.880	D	0.880	D	0.000	NO
		PM	0.802	D	0.802	D	0.000	NO
6	Gateway Boulevard & Pico Boulevard	AM	1.009	F	1.007	F	*(0.002)*	NO
		PM	1.010	F	1.015	F	+0.005	NO
7	Sawtelle Boulevard & Olympic Boulevard	AM	0.849	D	0.855	D	+0.006	NO
		PM	0.886	D	0.885	D	*(0.001)*	NO
8	Sawtelle Boulevard & Tennessee Avenue/Southbound I-405 Off-Ramp	AM	0.556	A	0.556	A	0.000	NO
		PM	0.830	D	0.829	D	*(0.001)*	NO
9	Sawtelle Boulevard & Pico Boulevard	AM	1.009	F	1.012	F	+0.003	NO
		PM	1.063	F	1.065	F	+0.002	NO
10	Exposition Boulevard & Sawtelle Boulevard	AM	0.494	A	0.506	A	+0.012	NO
		PM	0.826	D	0.825	D	*(0.001)*	NO
11	Sepulveda Boulevard & Pico Boulevard	AM	0.938	E	0.940	E	+0.002	NO
		PM	0.942	E	0.942	E	0.000	NO

Source: Overland Traffic Consultants, 2017.

Future Conditions

Future traffic volume projections have been developed to analyze the traffic conditions after completion of other planned land developments, including the Project. As noted above, the future conditions include existing plus ambient growth (with and without related projects) and existing plus ambient growth plus related projects (with and without the Project). The potential traffic growth in the future at the study intersections has been determined by adding the existing traffic volume, ambient traffic growth of one percent per year, and traffic from the other related projects. The related projects information was

obtained from LADOT, Department of City Planning, and the City of Santa Monica. It should be noted that this Project, or any actions taken by the City regarding this Project, does not have a direct bearing on the related projects. The location of the related projects are shown in Figure II-21, Location of Related Projects, and the detailed list of related projects are shown in Table II-5, List of Related Project; both the figure and table are in Section II, Project Description, of this IS/MND. Table III-25, Related Projects Trip Generation, summarizes the potential net increase in traffic from the related projects. Figure III-10, Related Projects Traffic Volumes (AM Peak Hour / PM Peak Hour), illustrate the number of trips added to the area by the related projects alone.

Table III-25
Related Projects Trip Generation

ID	Project Type	Daily Traffic	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
1	Supermarket Improvements	1,946	51	32	83	37	36	73
2	Residential and Retail	772	16	57	73	61	50	111
3	Pico-Sepulveda Mixed Use	3,181	115	94	209	112	154	266
4	YMCA Recreation Center	1,204	56	29	85	36	37	73
5	Hudson Pacific Office re-use	856	122	7	129	3	85	88
6	Windward School Student Increase	186	43	27	70	6	7	13
7	Martin Expo Town Center	8,407	305	248	553	318	308	626
8	Residential and Retail	682	10	36	46	34	21	55
9	Residential and Retail	327	13	28	41	25	13	38
10	Retail	422	9	6	15	52	52	104
11	Residential and Retail	1,824	13	64	77	115	89	204
12	Residential and Retail	559	6	13	19	27	24	51
13	Residential	259	6	25	31	9	5	14
	Car Dealership	347	2	1	3	3	3	6
14	Office	2,371	23	3	26	30	148	178
15	Residential and Retail	322	4	18	22	7	4	11
16	Office	1,588	198	27	225	36	178	215
	Retail	384	5	3	9	16	17	33
17	Village Trailer Park	1,893	33	65	98	70	55	125
18	School	1,041	0	439	439	0	262	262
19	Retail and Office	*(1,402)*	*(96)*	*(20)*	*(116)*	*(13)*	*(44)*	*(57)*
20	Residential and Retail/Commercial	329	0	28	28	0	*(3)*	*(3)*
21	School	550	--	60	60	--	51	51
22	School	1,939	--	448	448	--	197	197
23	Residential	24	0	2	2	0	2	2
	Warehouse	27	2	0	2	1	2	3
	Retail	620	18	11	29	22	23	45
24	School Expansion	284	0	95	95	0	28	28
25	Residential	274	0	107	107	0	47	47
26	School	838	0	199	199	0	63	63

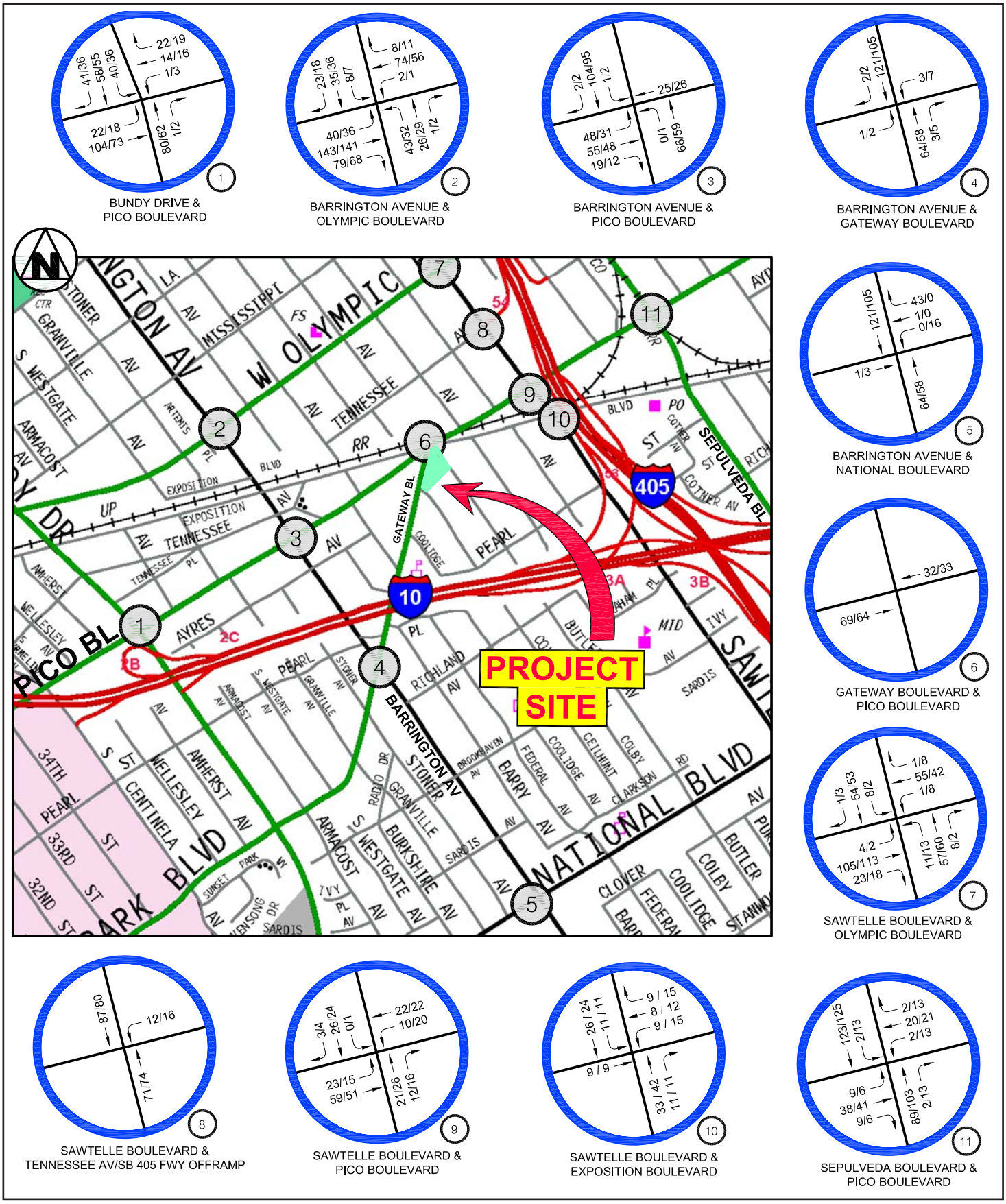
Table III-25
Related Projects Trip Generation

ID	Project Type	Daily Traffic	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
27	Office	350	41	6	47	9	42	50
28	Residential, Grocery, Retail	2,005	26	109	134	102	44	146
29	Exposition Transit Corridor Phase II	*Completed in May 2016*						
Source: Overland Traffic Consultants, 2017.								

Table III-26, Future (2020) Conditions LOS, summarizes the traffic conditions created by ambient growth plus the related projects (without the Project) and compares the estimated future traffic conditions with the existing conditions. Figures III-11 and III-12, Future Traffic Volumes without Project, illustrate the future cumulative peak hour traffic volumes without the Project in the AM peak hour and PM peak hour, respectively.

Table III-26
Future (2020) Conditions LOS

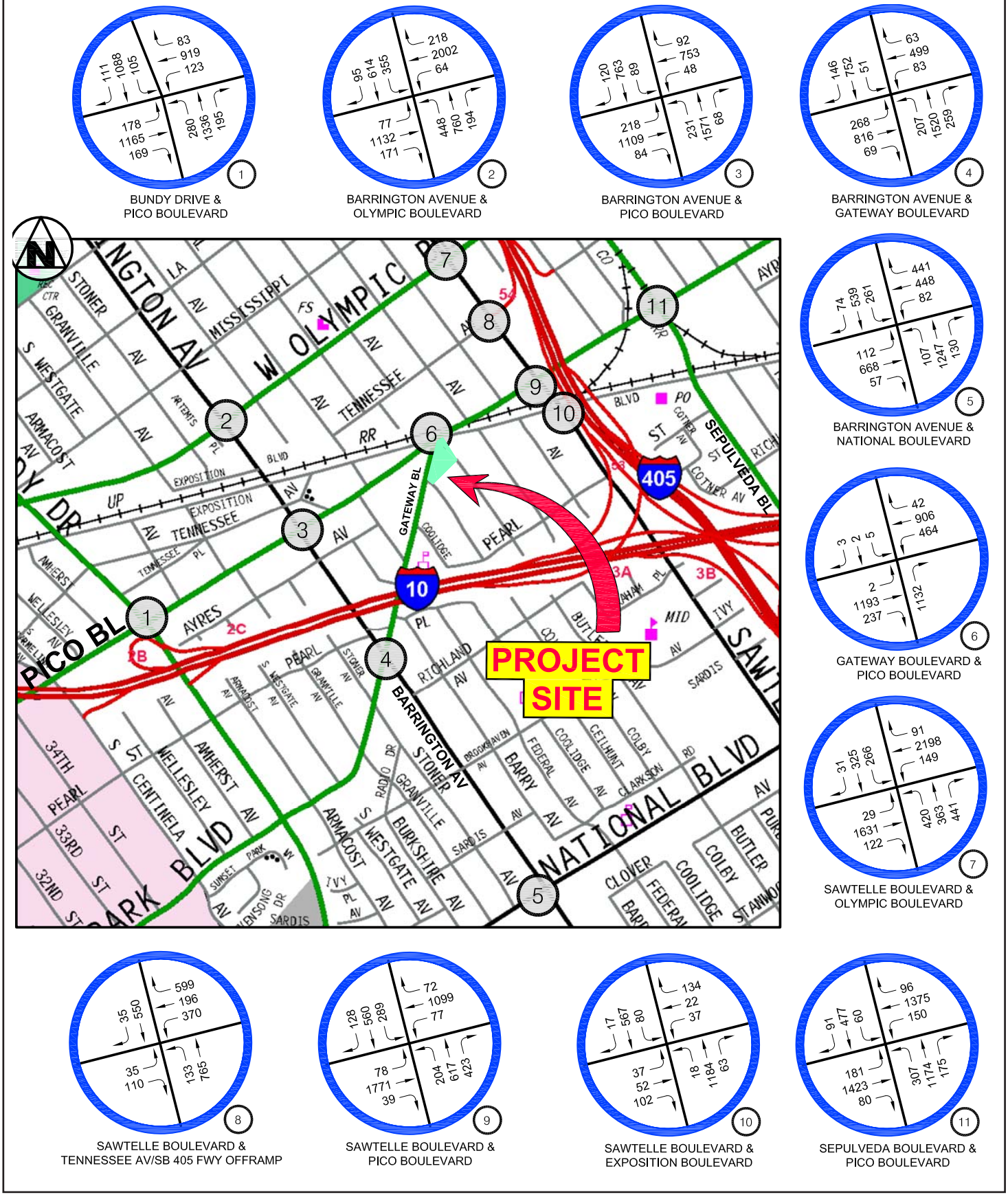
No.	Intersection	Peak Hour	Existing		Future without Project		
			CMA	LOS	CMA	LOS	Growth
1	Bundy Drive & Pico Boulevard	AM	1.001	F	1.104	F	+0.103
		PM	0.953	E	1.043	F	+0.090
2	Barrington Avenue & Olympic Boulevard	AM	0.949	E	1.052	F	+0.103
		PM	0.796	C	0.913	E	+0.117
3	Barrington Avenue & Pico Boulevard	AM	0.950	E	1.036	F	+0.086
		PM	0.965	E	1.057	F	+0.092
4	Barrington Avenue & Gateway Boulevard	AM	0.833	D	0.893	D	+0.060
		PM	0.871	D	0.947	E	+0.076
5	Barrington Avenue & National Boulevard	AM	0.880	D	0.958	E	+0.078
		PM	0.802	D	0.887	D	+0.085
6	Gateway Boulevard & Pico Boulevard	AM	1.009	F	1.076	F	+0.067
		PM	1.010	F	1.074	F	+0.064
7	Sawtelle Boulevard & Olympic Boulevard	AM	0.849	D	0.942	E	+0.093
		PM	0.886	D	1.006	F	+0.120
8	Sawtelle Boulevard & Tennessee Avenue/Southbound I-405 Off-Ramp	AM	0.556	A	0.609	B	+0.053
		PM	0.830	D	0.903	E	+0.073
9	Sawtelle Boulevard & Pico Boulevard	AM	1.009	F	1.083	F	+0.074
		PM	1.063	F	1.143	F	+0.080
10	Exposition Boulevard & Sawtelle Boulevard	AM	0.494	A	0.555	A	+0.061
		PM	0.826	D	0.889	D	+0.063
11	Sepulveda Boulevard & Pico Boulevard	AM	0.938	E	1.023	F	+0.085
		PM	0.942	E	1.051	F	+0.109
Source: Overland Traffic Consultants, 2017.							



Source: Overland Traffic Consultants, Inc., December 2016.

EcoTierra consulting

Figure III-10
Related Projects Traffic Volumes (AM Peak Hour / PM Peak Hour)



Source: Overland Traffic Consultants, Inc., December 2016.

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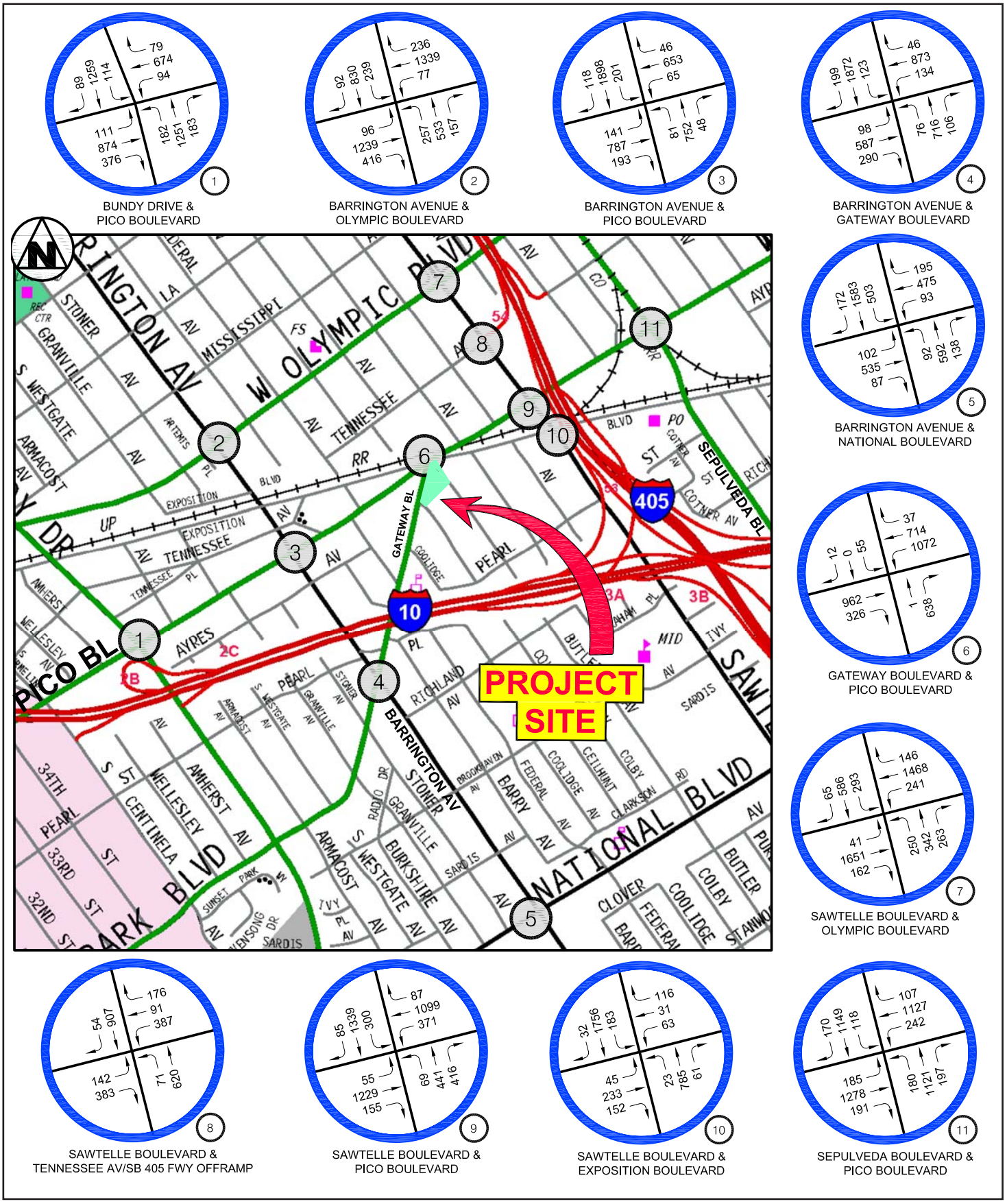
Figure III-11
Future Traffic Volumes without Project – AM Peak Hour



Source: Overland Traffic Consultants, Inc., December 2016.

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Figure III-12
Future Traffic Volumes without Project – PM Peak Hour

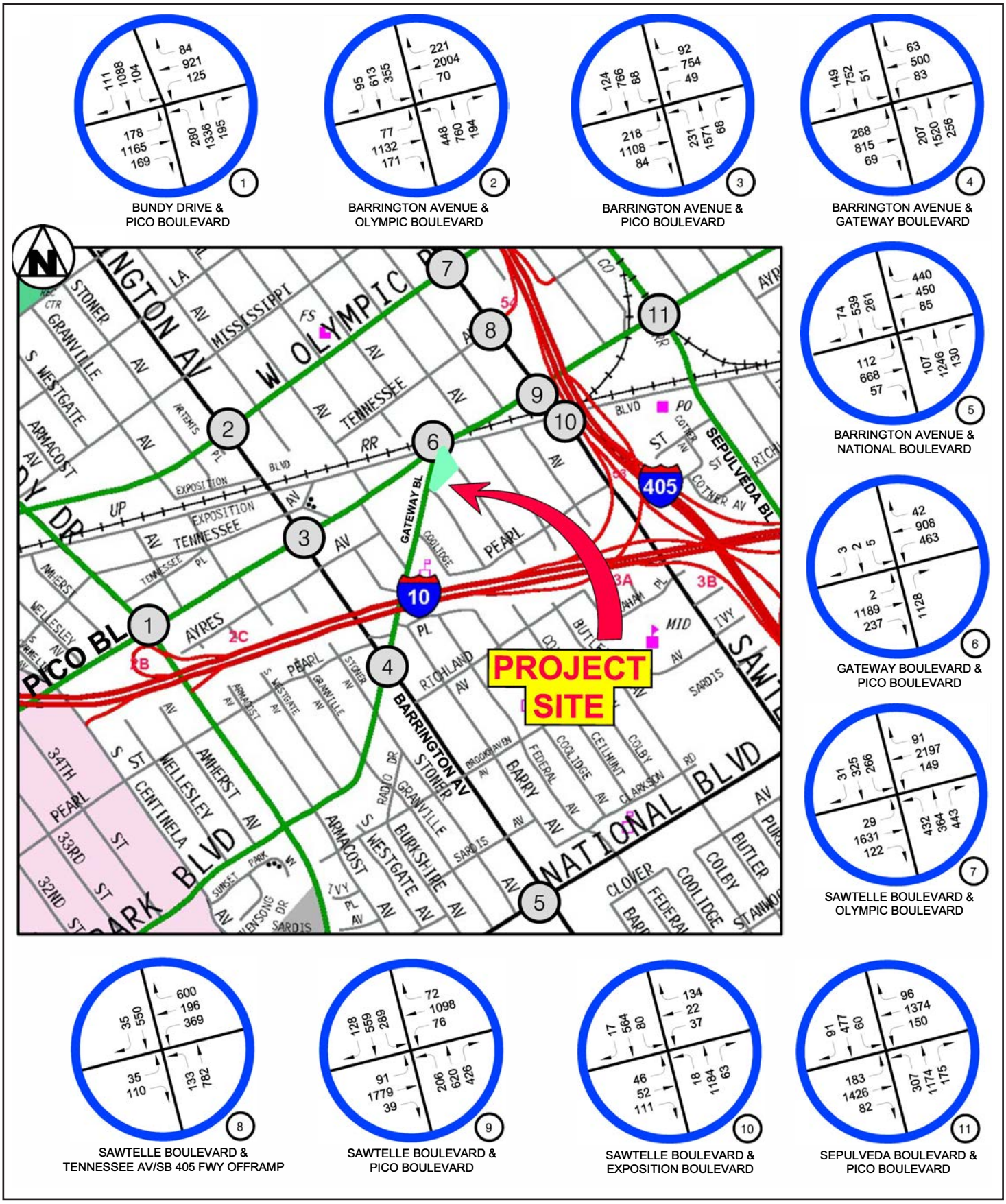
The future conditions and the estimated Project traffic volume were compared to determine if the thresholds of significance in Table III-20, see above, were exceeded. Table III-27, Future (2020) + Project Conditions LOS, summarizes the future traffic conditions with the estimated traffic volume that would be added by the Project. Figures III-13 and III-14, Future Traffic Volumes with Project, illustrate the future cumulative peak hour traffic volumes with the Project in the AM peak hour and PM peak hour, respectively. As shown, no significant impacts would result in the future plus Project condition. It should be noted that the impact analysis does not consider any changes to the existing intersection configurations (i.e., future roadway improvements).

Table III-27
Future (2020) + Project Conditions LOS

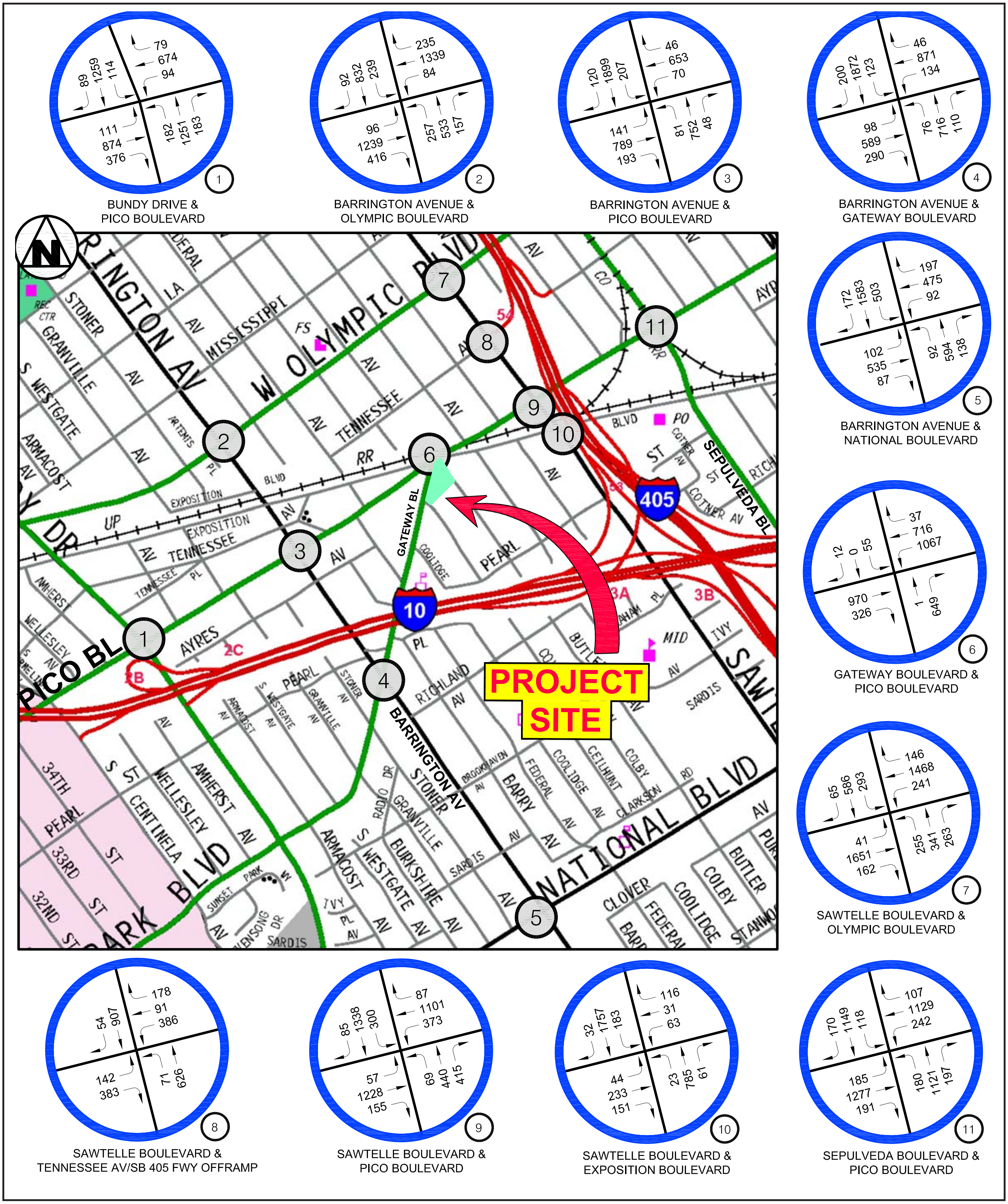
No.	Intersection	Peak Hour	Future		Future + Project			Significant Impact?
			CMA	LOS	CMA	LOS	Change	
1	Bundy Drive & Pico Boulevard	AM	1.104	F	1.105	F	+0.001	NO
		PM	1.043	F	1.043	F	0.000	NO
2	Barrington Avenue & Olympic Boulevard	AM	1.052	F	1.053	F	+0.001	NO
		PM	0.913	E	0.919	E	+0.006	NO
3	Barrington Avenue & Pico Boulevard	AM	1.036	F	1.035	F	*(0.001)*	NO
		PM	1.057	F	1.061	F	+0.004	NO
4	Barrington Avenue & Gateway Boulevard	AM	0.893	D	0.893	D	0.000	NO
		PM	0.947	E	0.946	E	*(0.001)*	NO
5	Barrington Avenue & National Boulevard	AM	0.958	E	0.957	E	*(0.001)*	NO
		PM	0.887	D	0.888	D	+0.001	NO
6	Gateway Boulevard & Pico Boulevard	AM	1.076	F	1.073	F	*(0.003)*	NO
		PM	1.074	F	1.079	F	+0.005	NO
7	Sawtelle Boulevard & Olympic Boulevard	AM	0.942	E	0.942	E	0.000	NO
		PM	1.006	F	1.006	F	0.000	NO
8	Sawtelle Boulevard & Tennessee Avenue/Southbound I-405 Off-Ramp	AM	0.609	B	0.609	B	0.000	NO
		PM	0.903	E	0.902	E	*(0.001)*	NO
9	Sawtelle Boulevard & Pico Boulevard	AM	1.083	F	1.087	F	+0.004	NO
		PM	1.143	F	1.143	F	0.000	NO
10	Exposition Boulevard & Sawtelle Boulevard	AM	0.555	A	0.567	A	+0.012	NO
		PM	0.889	D	0.889	D	0.000	NO
11	Sepulveda Boulevard & Pico Boulevard	AM	1.023	F	1.024	F	+0.001	NO
		PM	1.051	F	1.051	F	0.000	NO

Source: Overland Traffic Consultants, 2017.

Therefore, trips generated by the Project would not significantly impact any of the study intersections in either the existing plus Project condition or future plus Project condition. Operational impacts would be less than significant and no mitigation measures are required.



Source: Overland Traffic Consultants, Inc., December 2016.



Source: Overland Traffic Consultants, Inc., December 2016.

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Figure III-14
Future Traffic Volumes with Project – PM Peak Hour

Freeway Conditions Screening Analysis

LADOT and Caltrans District 7 have developed a screening process to determine the level of analysis necessary for land development projects. The screening criterion are based on the traffic volume and capacity of nearby freeway and ramp facilities, and the estimated volume of added project traffic. Four screening criterion have been developed by LADOT and Caltrans. If any of the four criteria are satisfied then additional traffic impact analysis is required.

1. The project's peak hour trips would result in a one percent or more increase to the freeway mainline capacity of a freeway segment operating at a LOS E or F (based on a capacity of 2,000 vehicles per hour per lane [vphpl]).
2. The project's peak hour trips would result in a two percent or more increase to the freeway mainline capacity of a freeway segment operating at a LOS D (based on a capacity of 2,000 vphpl).
3. The project's peak hour trips would result in a one percent or more increase to the freeway off ramp operating at a LOS E or F (based on an off ramp capacity of 850 vphpl as measured at the intersection).
4. The project's peak hour trips would result in a two percent or more increase to the freeway off ramp operating at a LOS E or F (based on an off ramp capacity of 850 vphpl as measured at the intersection).

As indicated below in Table III-28, Caltrans Freeway Conditions Screening Analysis, the Project would add at most five trips during the AM peak hour and three trips during the PM peak hour to the nearby segments of the San Diego Freeway and Santa Monica Freeway. Thus, none of the freeway segments with the highest volume of Project traffic would meet screening criteria 1 and 2 during either peak hour in either direction and, therefore, no additional analysis is necessary. Additionally, as also shown on Table III-28, none of the off-ramps serving the area of the Project would meet screening criteria 3 or 4 and, therefore, no further Caltrans analysis is required.

Table III-28
Caltrans Freeway Conditions Screening Analysis

Location	Direction	No. of Lanes	Capacity	Project Trips[a]		Percent Increase	
				AM	PM	AM	PM
Freeway Segment (2,000 vphpl)							
San Diego Freeway north of Santa Monica Freeway	NB	6	12,000	5	1	0.0%	0.0%
San Diego Freeway north of Santa Monica Freeway	SB	6	12,000	*(2)*	3	0.0%	0.0%
San Diego Freeway south of Santa Monica Freeway	NB	6	12,000	*(2)*	3	0.0%	0.0%
San Diego Freeway south of Santa Monica Freeway	SB	6	12,000	5	1	0.0%	0.0%
Santa Monica Freeway west of Barrington Ave.	EB	5	10,000	*(2)*	3	0.0%	0.0%
Santa Monica Freeway west of Barrington Ave.	WB	5	10,000	5	1	0.1%	0.0%
Santa Monica Freeway east of San Diego Freeway	EB	5	10,000	5	1	0.1%	0.0%
Santa Monica Freeway east of San Diego Freeway	WB	4	8,000	*(2)*	3	0.0%	0.0%
Off-Ramp Segment (850 vphpl)							
San Diego Freeway Off-Ramp to Sawtelle Blvd.	SB	3	2550	*(2)*	3	*(0.1%)*	0.1%
San Diego Freeway Off-Ramp to National Blvd.	NB	2	1700	*(2)*	3	*(0.1%)*	0.2%
Santa Monica Freeway Off-Ramp to Pico Blvd. east of Centinela Ave.	EB	3	2550	*(2)*	3	*(0.1%)*	0.1%
Santa Monica Freeway to Bundy Drive	WB	1	850	*(2)*	3	*(0.2%)*	0.4%

Note: NB = northbound; SB = southbound; WB = westbound; EB = eastbound; vphpl = vehicles per hour per lane
[a] *Estimated 15% of net Project trips to use any segment of freeway.*

Table III-28
Caltrans Freeway Conditions Screening Analysis

Location	Direction	No. of Lanes	Capacity	Project Trips[a]		Percent Increase	
				AM	PM	AM	PM
Source: Overland Traffic Consultants, 2017.							

Construction Traffic Impacts

The Project would be constructed over approximately 20 months, starting in early 2018. Construction activities would include demolition, grading, excavation, and building construction. Demolition, grading, excavation, and site preparation activities would occur over approximately 4 months, and building construction would occur over approximately 16 months. The Project would be ready for occupancy in early 2020.

Approximately 34,500 cubic yards of soil would be exported from the Project site, and no soil would be imported. Approximately 14,594 square feet of existing commercial uses would be demolished by the Project, as well as the surface parking lot areas. The likely haul route would be either 1) Gateway Boulevard north to Exposition Boulevard/Pico Boulevard, east on Exposition Boulevard to Sawtelle Boulevard, south on Sawtelle Boulevard to National Boulevard, then east on National Boulevard to the San Diego Freeway (Interstate 405); or 2) Gateway Boulevard north to Exposition Boulevard/Pico Boulevard, east on Exposition Boulevard to Sawtelle Boulevard, south on Sawtelle Boulevard to National Boulevard, east on National Boulevard to Overland Avenue, then south on Overland Avenue to the Santa Monica Freeway (Interstate 10). Exported materials would be disposed at the Puente Hills landfill in the City of Whittier (soil only), Bradley Landfill and Recycling Center in Sun Valley, and/or at the Atkinson Brickyard site in the City of Compton.

Construction workers would be on-site before 7:00 AM and would typically leave the Project site prior to 5:00 PM. These workers typically arrive and depart outside of the commuter peak hours, thereby minimizing the effect of construction worker traffic. During construction, there would be far fewer daily and peak hour trips than the Project trip generation estimates. As discussed above, traffic impacts during operation would be less than significant. Therefore, the construction process would not result in significant traffic impacts to study intersections.

The Project Applicant would be required to submit formal construction staging and traffic control plans for review and approval by LADOT prior to the issuance of any construction permits. A Construction Management Plan would be developed for use during the entire construction period and is incorporated as a Project design feature. The plan would include a designated haul route, staging area, and traffic control procedures to mitigate the traffic impacts during construction. This plan would also incorporate safety measures around the construction site to reduce the risk to pedestrian traffic near the work area. The Work Area Traffic Control Plan would identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity. Construction equipment and worker cars would generally be contained on-site. At times when on-site staging and parking is not available, a secondary staging area would be required. Thus, adherence to the required Work Area Traffic Control Plan would ensure construction-related impact would not result in a significant impact to the performance of the circulation system. Therefore, impacts would be less than significant and no mitigation measures are required.

b) Would the project 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. To address the increasing public concern that traffic congestion is impacting the quality of life and economic vitality of the State, the CMP was adopted to monitor regional traffic growth and related transportation improvements. The CMP designated a transportation network including all State highways and some arterials within Los Angeles County to be monitored by local jurisdictions. If LOS standards deteriorate on the CMP network, then local jurisdictions must prepare a deficiency plan to be in conformance with the program. Local jurisdictions found to be in non-conformance with the CMP risk the loss of State gas tax funding.

For purposes of the CMP LOS analysis, an increase in the freeway volume by 150 vehicles per hour during the AM or PM peak hours in any direction requires further analysis. A substantial change in freeway segments is defined as an increase or decrease of two percent in the demand to capacity ratio when at LOS F. For purposes of CMP intersections, an increase of 50 vehicles or more during the AM or PM peak requires further analysis.

The intersection of Santa Monica Boulevard and Bundy Drive is the nearest CMP intersection to the Project site, located approximately 1.5 miles to the northwest. Based on the distribution of Project trips, up to five percent of the Project traffic could be going through this intersection. This amount would be approximately 1 trip during the AM peak hour and 1 trip during the PM peak hour, which is below the 50-trip threshold for a potential CMP intersection impact.

The Project volumes on the area freeways are anticipated to be dispersed throughout the system. The Project is closest to the San Diego Freeway (I-405) and Santa Monica Freeway (I-10). Based on the trip distribution patterns in the area, the Project's access and proximity to destination points throughout the City, it is conservatively anticipated that no more than 15 percent of the Project volumes would be using any one segment of the freeway. The maximum number of freeway trips on any one freeway would then be six vehicles during the peak hours. This amount of traffic is below the threshold needed for further evaluation. Therefore, impacts to the CMP would be less than significant and no mitigation measures are required.

c) Would the project 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. This question would apply to a project only if it involved an aviation-related use or would influence changes to existing flight paths.

The Project does not include any aviation-related uses and would have no impact on any airport. It would also not require any modification of flight paths for the existing airports in the Los Angeles Basin. Therefore, no impact would occur and no mitigation measures are required.

d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Potentially Significant Unless Mitigation Incorporated. For the purpose of this issue, a significant impact may occur if a project included new roadway design or introduced a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced

in that area, or if project site access or other features were designed in such a way as to create hazard conditions.

The Project would have once vehicular access points, which would be accessed from Butler Avenue that intersects with Pico Boulevard/Exposition Boulevard on the east end of the Project site, leading to the 2-level subterranean parking structure. A gap study was conducted during the MOU process of the Traffic Report to identify if there would be sufficient traffic gaps to enter and leave the site from this one access point. The gap study is provided in Appendix J of the Traffic Report. The gap study determined there would be sufficient traffic gaps to accommodate right turns in and out of Butler Avenue to the Project site.

Butler Avenue is currently blocked off and gated south of the Project site. The portion of Butler Avenue between the barricade and Pico Boulevard/Exposition Boulevard is currently improved and operating as an alley. The Project would not change this condition. This short segment of Butler Avenue is shared with one neighbor along the northeast side of the roadway. The neighboring building is constructed along the property line. In order to improve the pedestrian experience and safety several improvements are proposed by the Project as design features. These design features are as follows:

- Blinking lights to alert motorists of potential pedestrian crossings where Butler Avenue intersects with the sidewalk,
- A rumble strip to slow vehicle speeds by requiring motorists to approach cautiously as they exit Butler Avenue,
- Signage to increase awareness of pedestrian activity along Gateway Boulevard, Pico Boulevard and Exposition Boulevard,
- Mirrors to increase visibility of pedestrian crossings for motorists on Butler Avenue, and
- Enhanced pavement markings to clearly delineate the sidewalk pathways.

Appendix J to the Traffic Report provides a pictorial presentation of the proposed pedestrian improvements. The Project driveway would conform to the City's design standards and would provide adequate sight distance and pedestrian movement controls meeting the City's requirements to protect pedestrian safety. Furthermore, the removal of the two existing driveways to the Project site along Gateway Boulevard could potentially improve circulation along that roadway and thereby resulting in a reduction of potential safety hazards.

Separate pedestrian entry points are provided, thus pedestrians would not share access points with vehicles. The main pedestrian entrance would be the ground-floor lobby at the corner of Gateway Boulevard and Pico Boulevard/Exposition Boulevard. No hazardous design features or uses would be introduced with the Project that would create significant hazards to the surrounding roadways; however, construction activities at the site may pose a temporary hazard for pedestrians, bicyclists, and vehicles. Thus, mitigation measure MM 16-1 is required to ensure safety measures are implemented during construction of the Project. Therefore, with implementation of mitigation measure MM 16-1, the potential impacts related to design hazards would be reduced to a less than significant level.

Mitigation Measure

MM 16-1. The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.)

from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times. Specifically, this measure shall include the following:

- Temporary pedestrian facilities shall be adjacent to the Project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

e) Would the project result in inadequate emergency access?

Less Than Significant Impact. For the purpose of this issue, a significant impact may occur if a project design does not provide emergency access meeting the requirements of LAFD or LAPD, or threatened the ability of emergency vehicles to access and serve the project site or adjacent uses.

As previously discussed under threshold question 8.g), above, there are no critical facilities and lifeline systems in the immediate vicinity of the Project site, and none of the roadways that run adjacent to the Project site (Gateway Boulevard, Exposition Boulevard/Pico Boulevard, Colby Avenue, and Butler Avenue) are identified as a disaster route by either the City or by Los Angeles County. Moreover, the Project would not cause permanent alterations to vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way. As shown under threshold question 16.a) above, the Project would not result in a significant impact to roadway performance.

Emergency access to the Project site would be provided by the existing street system, and the Project would be designed and constructed in accordance with LAMC requirements to ensure proper emergency access. Moreover, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lane of opposing traffic. As the Project would not significantly impact roadway performance and based on the above considerations, it is anticipated that LAFD and LAPD would be able to respond to on-site areas within the established response time. The Project would be subject to the site plan review requirements of LAFD and LAPD to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. Therefore, there would be no impact related to emergency access and no mitigation measures are required.

f) Would the project 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. For the purpose of this issue, a significant impact may occur if a project would conflict with adopted policies designed to support alternative transportation or involve modification of existing alternative transportation facilities located on- or off-site, or otherwise decrease the performance of such facilities.

Public Transit

Public transit access to the general Project site area is provided by the Big Blue Bus (BBB) operated by the City of Santa Monica. Bus lines with a stop within at least 1,500 feet of the Project site area include the following:

- BBB Route 7 – nearest stop at Pico Boulevard and Gateway Boulevard, approximately 190 feet west of the Project site;
- BBB Route 4 – nearest stop at Pico Boulevard and Sawtelle Boulevard, approximately 1,040 feet east of the Project site;
- BBB Route 17 – nearest stop at Exposition Boulevard and Sawtelle Boulevard, approximately 1,088 feet east of the Project site; and
- BBB Route 5 – nearest stop at Olympic Boulevard and Purdue Avenue, approximately 1,300 feet north of the Project site.

The Metro Rail Expo Line is adjacent to the Project site area, approximately 115 feet to the north, with station stops at Exposition Boulevard and Sepulveda Boulevard (approximately 0.4 mile east of the Project site) and Exposition Boulevard and Bundy Drive (approximately 0.6 mile west of the Project site). The Expo Line provides service between downtown Los Angeles and downtown Santa Monica.

As discussed under threshold question 16.a), above, the Project is forecasted to generate a net increase of approximately 455 weekday daily trips with 24 trips during the AM peak hour and 12 trips during the PM peak hour. Per CMP guidelines, person trips can be estimated by multiplying the total trips generated by 1.4. The trips assigned to transit may be calculated by multiplying the person trips generated by 3.5 percent. The CMP Transit trip generation calculation is shown on Table III-29, Transit Trips.

Table III-29
Transit Trips

	Daily	AM Peak Hour	PM Peak Hour
Project Trips	455	24	12
Person Trips (project trips x 1.4)	637	34	17
Transit Trips (person trips x 3.5%)	**22**	**1**	**1**
Source: Overland Traffic Consultants, 2017.			

Transit services in the area have been observed to be currently operating under capacity. This level of transit increase is not expected to adversely affect the current ridership of the transit services in the area. The Project would not result in the disruption of public transit services or the alteration of public transit routes, nor would the Project decrease the performance or safety of the existing transit service in the Project vicinity. Therefore, impacts would be less than significant and no mitigation measures are required.

Bicycle Facilities

The City adopted a 2010 Bicycle Master Plan to encourage alternative modes of transportation throughout the City. The Master Plan was developed to provide a network system that is safe and efficient to use in coordination with the vehicle and pedestrian traffic on the City street systems. The Master Plan has mapped out the existing, funded, and potential future Bicycle Paths, Bicycle Lanes, and Bicycle Routes. In the 2010 Master Plan, Gateway Boulevard is identified as a Bicycle Friendly Street and part of the

Neighborhood Bikeway Network, and Pico Boulevard is identified as providing a Bicycle Lane and part of the Backbone Bikeway Network. There is an existing bike lane on Gateway Boulevard south of Pico Boulevard. Additionally, the City's Mobility Plan 2035 has identified a Bicycle Enhanced Network. The Mobility Plan indicates that Tier 2 bicycle lanes are more likely to be built by 2035 than Tier 3 lanes. The plan entails roadways be improved with bike detectors at actuated signals. Gateway Boulevard is identified as a Tier 2 bicycle lane and Pico Boulevard is identified as a Tier 3 bicycle lane. The completed Project would not deter the implementation of these plans.

LAMC Section 12.21-A,16(a)(2) requires new projects to provide bicycle parking spaces. Multi-family residential uses require one long-term bicycle parking space per dwelling unit and one short-term bicycle parking space per 10 dwelling units. Per LAMC, short term bicycle parking shall consist of bicycle racks that support the bicycle frame at two points. Long term bicycle parking shall be secured from the general public and enclosed on all sides and protect bicycles from inclement weather. As required and demonstrated below in Table III-30, the new Project must provide, at a minimum, 13 short-term and 129 long-term bicycle spaces.

Table III-30
City-Required Bicycle Parking

Land Use	Size	Ratio for Short-Term Bicycle Parking	Required Short-Term Spaces	Ratio for Long-Term Bicycle Parking	Required Long-Term Spaces
Multi-family Residential	129 du	1/10 du	13	1/du	129
		Total	**13**		**129**

du = dwelling units
Source: Overland Traffic Consultants, 2017.

The Project would provide 146 bicycle parking spaces for its residential uses (14 short-term and 132 long-term). Thus, the Project exceeds the LAMC requirement by four bicycle parking spaces (one short-term and three long-term spaces over required minimum). Therefore, as the Project would not conflict with implementation of bicycle facilities and infrastructure as set forth in the 2010 Bicycle Master Plan and the Mobility Plan 2035, and as the Project exceeds the City's minimum requirement for bicycle parking spaces, impacts would be less than significant and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects]) with respect to the topics listed in the traffic analysis above. The cumulative impacts study area for transportation and traffic is similar to the study area for the Project traffic analysis.

With respect to construction traffic, it is unknown whether or not any of the related projects would have overlapping construction schedules with the Project. However, similar to the Project, the related projects would be required to submit formal construction staging and traffic control plans for review and approval by the City prior to the issuance of construction permits. The Work Area Traffic Control Plan would identify all traffic control measures, signs, delineators, and work instructions through the duration of construction activities. It is reasonably anticipated that the related projects would comply with this requirement, similar to the Project, and as such, the cumulative construction traffic impact would be less than significant and no mitigation measures are required.

Existing traffic, related projects' traffic, Project traffic, and a one percent per year ambient growth factor were added together to estimate future cumulative traffic volumes. As shown in Table III-27, the future traffic volumes of the related projects and ambient growth with the Project would not result in significant impacts. Therefore, the cumulative traffic operational impact would be less than significant and no mitigation measures are required.

17. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Less Than Significant Impact. Assembly Bill 52 (AB 52), signed into law on September 25, 2014, requires lead agencies to evaluate a project's potential to impact Tribal Cultural Resources (TCR) and establishes a formal consultation process for California Native American Tribes as part of CEQA. TCR includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. AB 52 also gives lead agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a TCR. Consultation is required upon request by a California Native American tribe that has previously requested that the City provide it with notice of such projects, and that is traditionally and culturally affiliated with the geographic area of a proposed project.

The City commenced tribal notification in accordance with AB 52 on March 17, 2016, via a mailing to all of the surrounding tribes on the AB 52 notification list. The 30-day notification response window closed on April 15, 2016. Only one California Native American tribe, the Gabrieleño Band of Mission Indians – Kizh Nation (the "Kizh Gabrieleño Tribe"), responded. In their letter dated March 24, 2016, the Kizh Gabrieleño Tribe did not request formal consultation. Additionally, the Kizh Gabrieleño Tribe did not proclaim the presence of TCR on or in the vicinity of the Project site. Furthermore, as previously discussed under threshold question 5.a), above, the on-site structures are not eligible for listing as a historic resource at the national or State level, and the Project site does not require historic preservation review and is not within a historic preservation overlay zone; nor is the Project site identified as an eligible resource by Survey LA, the City's official Historic Resources Survey, or as a City Historic-Cultural Monument. Nonetheless, so as to ensure any unforeseen and inadvertent discovery of TCRs would not result in a potentially significant impact, in the event that objects or artifacts that may be TCRs are encountered during the course of any ground-disturbance activities, all such activities would temporarily cease on the Project site until the potential TCR(s) is properly assessed following specific protocol required by the Department of City Planning. Therefore, impacts would be less than significant and no mitigation measures are required. To ensure compliance with the inadvertent discovery protocol, the following regulatory compliance measure is recommended.

Regulatory Compliance Measure

RCM 17-1. If suspected Tribal Cultural Resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist and/or tribal monitor from a tribe with cultural ties to the geographic

area of the Project site has evaluated the find. Personnel of the proposed Project shall not collect or move any suspected Tribal Cultural Resources and associated materials. Construction activity may continue unimpeded on other portions of the Project site. 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.

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. 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 discussed above, the City provided notice to tribes soliciting requests for consultation on March 17, 2016. The 30-day notification response window closed on April 15, 2016. One California Native American tribe, the Kizh Gabrieleño Tribe, responded, and did not proclaim the presence of TCR on or in the vicinity of the Project site. As previously discussed under threshold question 5.b), the Project site does not contain any known archaeological sites or archaeological survey areas. Furthermore, a Sacred Lands File search conducted by the Native American Heritage Commission (NAHC) in February, 2017, on behalf of the Project yielded negative results (i.e., no known resources), and records search by the South Central Coastal Information Center (SCCIC) housed at California State University, Fullerton, in March, 2017, on behalf of the Project also showed no known resources occur on site. Thus, as 1) the Project site is not listed nor eligible for listing on the national, State, or local register of historic resources; and 2) due to the lack of substantial evidence in City, NAHC, and SCCIC databases or resultant from the AB 52 process demonstrating the contrary, the City, as lead agency, has determined the Project site is not a TCR as defined by PRC Section 21074. Nonetheless, so as to ensure any unforeseen and inadvertent discovery of TCRs would not result in a potentially significant impact, in the event that objects or artifacts that may be TCRs are encountered during the course of any ground-disturbance activities, all such activities would temporarily cease on the Project site until the potential TCR(s) is properly assessed following specific protocol required by the Department of City Planning (see RCM 17-1, above). Therefore, impacts would be less than significant and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the topics listed in the TCR analysis above. The cumulative impacts study area for TCRs is the extent of the related projects.

The Project site does not contain any known TCR, nor did search results by NAHC or SCCIC, or the AB 52 process provide substantial evidence as to the presence of TCR on site or in the vicinity of the Project.

Additionally, compliance with existing regulatory measures would ensure potential impacts from the inadvertent discovery of TCR would be reduced to a less than significant level. It is unknown whether or not any of the properties on which the related projects are located contain TCRs. Related projects requiring the preparation of an IS/ND, IS/MND, or EIR are subject to the requirements of AB 52, which includes notifying tribes to solicit consultation and to analyze potential impact of TCRs. Any related project sites that contain TCRs would be required to comply with regulations and/or safeguard mitigation measures to reduce potential impacts to the greatest extent feasible. Nonetheless, as there are no known TCRs on the Project site, there is no potential for the Project to contribute to a cumulative impact.

18. UTILITIES AND SERVICE SYSTEMS

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. For the purpose of this issue, a significant impact may occur if a project would discharge wastewater, whose content exceeds the regulatory limits established by the governing agency.

CWC Section 13260 states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge containing information which may be required by the appropriate Regional Water Quality Control Board (RWQCB). The RWQCB then authorizes a NPDES permit that ensures compliance with wastewater treatment and discharge requirements.

LARWQCB enforces wastewater treatment and discharge requirements for properties in the Project area. The wastewater generated by the Project would be typical of residential land use. No industrial discharge into the wastewater system would occur. The Project would convey wastewater via municipal sewage infrastructure maintained by the City's Bureau of Sanitation to the Hyperion Treatment Plant (HTP). The capacity of HTP is discussed under threshold question 17.b), below. HTP is a public facility, and, therefore, is subject to the State's wastewater treatment requirements. As such, wastewater from the implementation of the Project would be treated according to the wastewater treatment requirements enforced by LARWQCB. Impacts would be less than significant and no mitigation measures are required.

b) Would the project 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. For the purpose of this issue, a significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on water shall be made considering the following factors:

- The total estimated water demand for the project;
- Whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout;
- The amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and

- The degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

Water Treatment Facilities and Existing Infrastructure

The City of Los Angeles Department of Water and Power (LADWP) currently supplies water to the Project site. LADWP is responsible for ensuring that water demand within the City is met and that State and federal water quality standards are achieved. LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,200 miles of pipelines, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Much of the water flows north to south, entering the City at the Los Angeles Aqueduct Filtration Plant (LAAFP), which is owned and operated by LADWP, in the community of Sylmar. LAAFP has the capacity to treat approximately 600 million gallons per day (mgd), and the average plant flow is approximately 296 mgd (averaged over calendar year 2015). Therefore, LAAFP has a remaining capacity of treating approximately 304 mgd, depending on the season.

The Project's estimated water consumption is presented on Table III-31, Estimated Average Daily Water Consumption. As shown, the Project would consume a net total of approximately 12,365 gallons per day (gpd) (0.01 mgd), or 13.85 acre-feet of water per year. Thus, implementation of the Project is not expected to measurably reduce LAAFP's capacity, and as such, no new or expanded water treatment facilities would be required. Therefore, with respect to water treatment facilities, impacts would be less than significant and no mitigation measures are required. As the Project is consistent with the underlying General Plan land use designation, the Project would be within LADWP's growth projections in terms of supplies and infrastructure and it is, therefore, anticipated that LADWP would be able to meet the Project's water treatment demand.

Table III-31
Estimated Average Daily Water Consumption

Land Use	Size	Consumption Rate[a]	Total Water Consumed (gpd)	Total Water Consumed (AF/Y)
Project:				
Studio apartments	63 du	90 gpd/du	5,670	6.35
One-bedroom apartments	60 du	132 gpd/du	7,920	8.87
Two-bedroom apartments	6 du	180 gpd/du	1,080	1.21
Community Open Areas	11,324 sf	60 gpd/1,000 sf	679	0.76
Existing Uses:				
Dry Cleaner	1,390 sf	60 gpd/1,000 sf	83	0.09
Restaurant	1,770 sf	864 gpd/1,000 sf	1,529	1.71
Automotive Facilities	11,434 sf	120 gpd/1,000 sf	1,372	1.54
		Project Total:	**15,349**	**17.19**
		Existing Uses Total:	*2,984*	*3.34*
		Project Net Total:	**12,365**	**13.85**

Notes
sf = square feet; du = dwelling units; gpd = gallons per day; AF/Y = acre-feet per year; gal = gallons
[a] *Based on 120% of rates provided in the letter correspondence from Ali Poosti, Division Manager, City of Los Angeles Department of Public Works' Bureau of Sanitation Wastewater Engineering Services Division, January 19, 2016.*
Source (table): EcoTierra Consulting, 2016.

In addition to supplying water for domestic uses, LADWP also supplies water for fire protection services, in accordance with the Fire Code. As identified under threshold question 14.a), above, LAFD requires a water flow of 6,000 to 9,000 gpm from four fire hydrants flowing simultaneously with a residual water pressure of 20 PSI. The existing water lines that currently serve the Project site would serve the proposed Project. If water main or infrastructure upgrades are required, the Project Applicant would be required to pay for such upgrades, which would be constructed by either the Project Applicant or LADWP. To the extent such upgrades result in a temporary disruption in service, proper notification to LADWP customers would take place, as is standard practice. In the event that water main and other infrastructure upgrades are required, it would not be expected to create a significant impact to the physical environment because: (1) any disruption of service would be of a short-term nature, (2) replacement of the water mains would be within public rights-of-way, and (3) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity. Therefore, potential impacts resulting from water infrastructure improvements, if any are to be required, would be less than significant and no mitigation measures are required.

Furthermore, the Project would comply with the City's mandatory water conservation measures that, relative to the City's increase in population, have reduced the rate of water demand in recent years. LADWP's growth projections are based on conservation measures and adequate treatment capacity that is, or would be, available to treat LADWP's projected water supply, as well as the LADWP's expected water sources. Compliance with water conservation measures, including Title 20 and 24 of the California Administrative Code would serve to reduce the projected water demand. Chapter XII of LAMC comprises the City's Emergency Water Conservation Plan. The Emergency Water Conservation Plan stipulates conservation measures pertaining to water closets, showers, landscaping, maintenance activities, and other uses. At the State level, Title 24 of the California Administrative Code contains the California Building Standards, including the California Plumbing Code (Part 5), which promotes water conservation. Title 20 of the California Administrative Code addresses Public Utilities and Energy and includes appliance efficiency standards that promote conservation. Various sections of the Health and Safety Code also regulate water use. Overall, the Project's water demand is expected to comprise a small percentage of LADWP's existing water supplies. Therefore, the impact would be less than significant and no mitigation measures are required.

Wastewater Treatment Facilities and Existing Infrastructure

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if:

- A project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or
- A project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General plan and its elements.

The City's Bureau of Sanitation provides sewer service to the Project area. The existing Project site has existing sewer connections to the City's sewer system. Sewage from the Project site is conveyed via existing sewer infrastructure to the HTP. Since 1987, the HTP has had capacity for full secondary treatment. Currently, the plant treats an average daily flow of 275 mgd in dry weather, which can double in wet weather; however, the HTP has capacity to treat a maximum daily flow of 450 mgd and peak wet

weather flow of 800 mgd.[95] This equals a typical remaining capacity of 175 mgd of wastewater able to be treated at the HTP.[96]

Estimated Project wastewater generation is presented below in Table III-32, Estimated Average Daily Wastewater Generation. As shown, the Project would generate approximately 10,304 net gpd (0.01 mgd) of wastewater. Therefore, the HTP would have adequate capacity to serve the Project. As such, with respect to the capacities of wastewater treatment facilities, impacts would be less than significant and no mitigation measures are required.

Table III-32
Estimated Average Daily Wastewater Generation

Land Use	Size	Generation Rate[a]	Total Wastewater Generated (gpd)
Project:			
Studio apartments	63 du	75 gpd/du	4,725
One-bedroom apartments	60 du	110 gpd/du	6,600
Two-bedroom apartments	6 du	150 gpd/du	900
Community Open Areas	11,324 sf	50 gpd/1,000 sf	566
Existing Uses:			
Dry Cleaner	1,390 sf	50 gpd/1,000 sf	70
Restaurant	1,770 sf	720 gpd/1,000 sf	1,274
Automotive Facilities	11,434 sf	100 gpd/1,000 sf	1,143
		Project Total:	12,791
		Less Existing Uses Total:	*2,487*
		Project Net Total:	**10,304**

Notes

sf = square feet; du = dwelling units; gpd = gallons per day; gal = gallons

[a] *Letter correspondence from Ali Poosti, Division Manager, City of Los Angeles Department of Public Works' Bureau of Sanitation Wastewater Engineering Services Division, January 19, 2016.*

Source (table): EcoTierra Consulting, 2016.

Existing wastewater infrastructure serving the Project site includes an 8-inch diameter pipeline within Gateway Boulevard right-of-way and an 8-inch diameter pipeline within Butler Avenue right-of-way. Wastewater from both of these pipelines joint to feed into a 30-inch diameter pipeline within National Boulevard right-of-way before discharging into a 42-inch diameter pipeline within Barrington Avenue right-of-way. According to the City's Bureau of Sanitation, the current flow level in the 8-inch diameter pipelines cannot be determined at this time without additional gauging.[97]

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[95] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Clean Water, Hyperion Water Reclamation Plant, website: 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, accessed: November 10, 2016.*

[96] *City of Los Angeles Department of Public Works, Bureau of Sanitation, About Wastewater, website: http://www.lacitysan.org/wastewater/factsfigures.htm, accessed: January 2016.*

[97] *Letter correspondence from Ali Poosti, Division Manager, City of Los Angeles Department of Public Works' Bureau of Sanitation Wastewater Engineering Services Division, January 19, 2016. (Appendix G)*

Based on the estimated net wastewater generation of approximately 10,304 gpd (0.01 mgd), it is reasonably anticipated that the existing sewer lines have excess capacity and would thus be able to accommodate the additional flow. Nonetheless, as part of the building permit process, the City will require detailed gauging and evaluation of the Project's wastewater connection point at the time of connection to the system. If deficiencies are identified at that time, the Project Applicant would be required, at their own cost, to build secondary sewer lines to a connection point in the sewer system with sufficient capacity, in accordance with standard City procedures. The installation of any such secondary lines, if needed, would require minimal trenching and pipeline installation, which would be a temporary action and would not result in any adverse environmental impacts. Therefore, impacts would be less than significant and no mitigation measures are required.

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

No Impact. For the purpose of this issue, 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, resulting in the construction of new storm water drainage facilities.

As described under threshold question 9.c), above, the Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the Project Site is and would continue to be collected on the site and directed towards existing storm drains in the vicinity. Therefore, the Project would not create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems. No impact would occur and no mitigation measures are required.

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

Less Than Significant Impact. For the purpose of this issue, a significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on water shall be made considering the following factors:

- The total estimated water demand for the project;
- Whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout;
- The amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and
- The degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

The City's water supply primarily comes from the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California (MWD), which is obtained from the Colorado River Aqueduct, and to a lesser degree from local groundwater sources. MWD uses a land use based planning tool that allocates projected demographic data from SCAG into water service areas for each of MWD's member agencies. These sources, along with recycled water, are expected to supply the

City's water needs in the years to come. LADWP's 2015 Urban Water Management Plan (UWMP) projects a water supply of between 611,800 AF/Y and 642,400 AF/Y in 2020 and between 675,700 AF/Y and 709,500 AF/Y in 2040 for average weather year and single dry year, respectively. With LADWP's current water supplies, planned future water conservation, and planned future water supplies, LADWP will be able to reliably provide water to its customers through the 25-year planning period covered by the 2015 UWMP. Any shortfall in LADWP controlled supplies (e.g., groundwater, recycled, conservation, or aqueduct) is offset with MWD purchases to rise to the level of demand.[98] As shown in Table III-31, above, the Project would consume a net increase of approximately 12,365 gpd (13.85 AF/Y) of water. This amount represents approximately 0.002 percent of the water supply in 2020 and 2040 in both average weather and dry weather years. Thus, the Project's water demand is not anticipated to require new water supply entitlements and/or require the expansion of existing or construction of new water facilities beyond those already considered in the 2015 UWMP.

LADWP's Water System 10-Year Capital Improvement Program for the Fiscal Years 2010-2019 details LADWP's 10-year process of capital upgrades to the water infrastructure system of the City. Through this program, LADWP can provide reliable sources of water to the residents of the City.[99] Thus, sufficient water supplies are anticipated to be available to serve the Project from existing entitlements and resources, and new or expanded entitlements would not be necessary. Moreover, the Project's land uses, density, and intensity are consistent with the General Plan/Community Plan's land use designation, and the addition of 129 dwelling units as a result of the Project would be consistent with Citywide growth, and thereby accounted for in the 2015 UWMP. Thus, the Project's estimated water usage is within overall General Plan projections and would not exceed the amount anticipated by the City's long-range land use and planning efforts.

To ensure that the Project reduces its projected water demand to the extent feasible, the Project would be required to comply with Ordinance No. 170,978 (Landscape Ordinance), which imposes numerous water conservation measures in landscaping, installation, and maintenance (e.g, use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

Thus, it is reasonably anticipated that the Project would not create any water system capacity issues, and sufficient reliable water supplies would be available to meet Project demands. Therefore, for the reasons stated above, impacts would be less than significant and no mitigation measures are required. To ensure compliance water efficient design standards, the following regulatory compliance measures are recommended.

Regulatory Compliance Measures

RCM 18-1. The Project shall implement all applicable mandatory measures within the Los Angeles Green Building Code that would have the effect of reducing the Project's water use. Water demand will be further reduced through incorporation of the following:

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[98] *City of Los Angeles Department of Water and Power, Urban Water Management Plan 2015, June 7, 2016, website: http://www.ladwp.com/uwmp, accessed: November 2016.*

[99] *City of Los Angeles Department of Water and Power, Water System Ten-Year Capital Improvement Program for the Fiscal Years 2010-2019, website: http://www.ladwp.com, accessed: January 2016.*

- High-efficiency toilets (maximum 1.28 gallons per flush), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gallons per flush), including no-flush or waterless urinals, in all restrooms as appropriate.
- Restroom faucets with a maximum flow rate of 1.5 gallons per minute and self-closing design.
- High-efficiency Energy Star-rated dishwashers, if provided.
- Prohibiting the use of single-pass cooling equipment (single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system).
- Demand (tankless or instantaneous) water heater system sufficient to serve the anticipated needs of the dwellings.
- No more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.
- High-efficiency clothes washers (water factor of 6.0 or less), if provided in either individual units and/or in a common laundry room(s).

RCM 18-2. The Project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season). Water demand will be further reduced through incorporation of the following:

- Weather-based irrigation controller with rain shutoff.
- Matched precipitation (flow) rates for sprinkler heads.
- Drip/microspray/subsurface irrigation where appropriate.
- Minimum irrigation system distribution uniformity of 75 percent.
- Proper hydro-zoning, turf minimization and use of native/drought tolerant plan materials.
- Use of landscape contouring to minimize precipitation runoff.
- A separate water meter (or submeter), flow sensor, and master valve shutoff for irrigated landscape areas totaling 5,000 square feet and greater.

e) Would the project 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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if:

- A project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or

- A project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General plan and its elements.

As stated under threshold question 17.b), above, the sewage flow from operation of the Project would ultimately be conveyed to HTP, which has sufficient capacity for the Project.[100] Therefore, impacts would be less than significant and no mitigation measures are required.

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

Less Than Significant Impact. For the purpose of this issue, 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 the project results in a significant impact on solid waste shall be made considering the following factors:

- 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;

- Need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and

- Whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element or its updates, the Solid Waste Management Policy Plan, Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the Source Reduction and Recycling Element.

Solid waste generated within the City is disposed of at privately-owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multi-family developments, private haulers provide waste collection services for most multi-family residential developments within the City. It is reasonably anticipated, then, that the Project Applicant would contract with a local commercial solid waste hauler following completion of the Project. As is typical for most solid waste haulers in the greater Los Angeles Area, the hauler would most likely separate and recycle all reusable material collected from the Project site at a local materials recovery facility. The remaining solid waste would be disposed of at a variety of landfills, depending on with whom the hauler has contracts. Most commonly, the City is served by the Sunshine Canyon Landfill. This Class III landfill accepts non-hazardous solid waste including construction and demolition (C&D) waste. Chiquita Canyon Landfill is also a Class III landfill accepting non-hazardous solid waste including C&D waste that serves the area; however, this landfill currently has a one-year life expectancy remaining based on 2015 average daily disposal. An expansion of this landfill is currently proposed, which would add an additional

[100] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Wastewater: About Wastewater, Facts and Figures, website: http://www.lacitysan.org/wastewater/factsfigures.htm, accessed: January 2016.*

45 years of use based on 2015 average daily disposal rates (the Master Plan Revision Draft Environmental Impact Report was circulated in 2014; however, a Final Environmental Impact Report has not yet been published).[101] Moreover, as of 2015, Azusa Land Reclamation is the only permitted inert (i.e., unclassified and C&D waste which includes earth, rock, concrete rubble, asphalt paving fragments, etc.) in Los Angeles County that has a full solid waste facility permit.[102] Table III-33, Current Landfill Capacity and Intake, details the permitted daily intake and estimated remaining capacity at these landfill currently.

Table III-33
Current Landfill Capacity and Intake

Landfill Facility	Permitted Daily Intake (tpd)[a]	2015 Average Daily Intake (tpd)[a]	Remaining Daily Permitting Capacity (tpd)	Estimated Total Remaining Permitting Capacity[a] (million tons)
Class III Landfills				
Sunshine Canyon	12,100	7,701	4,399	73
Inert Construction & Demolition Waste-Accepting Landfill				
Azusa Land Reclamation	6,500	846	5,654	58

Notes: tpd = tons per day

[a] *Los Angeles County Department of Public Works, Countywide Integrated Waste Management Plan, 2015 Annual Report, published December 2016, page 71 and Appendix E-2 Table 1, website: http://dpw.lacounty.gov/landing/wasteManagement.cfm, accessed: January 2017.*

Source (table): EcoTierra Consulting, 2017.

Construction Impacts

Implementation of the Project would generate C&D waste. C&D debris includes concrete, asphalt, wood, drywall, metals, concrete rubble, and other miscellaneous and composite materials. Table III-34, Estimated Project Construction and Demolition Solid Waste, presents the Project's estimated C&D waste.

Table III-34
Estimated Project Construction and Demolition Solid Waste

Construction Activity	Size	Generation Rate[a]	Total Solid Waste Generated
Project Construction	88,160 sf	4.39 lbs/sf	387,022 lbs (194 tons)
Demolition of Existing Nonresidential Uses	14,594 sf	158 lbs/sf	2,305,852 lbs (1,153 tons)
		Total:	**2,692,874 lbs (1,347 tons)**

Notes: sf = square feet; lbs = pounds

[a] *Source: U.S. Environmental Protection Agency, Estimating 2003 Building-Related Construction and Demolition Material Amounts, March 2009, Table 2-1 (Residential Construction) and Table 2-4 (Nonresidential Demolition), pages 9, 14.*

Source (table): EcoTierra Consulting, 2016.

[101] *Los Angeles County Department of Public Works, Countywide Integrated Waste Management Plan, 2015 Annual Report, published December 2016, website: http://dpw.lacounty.gov/landing/wasteManagement.cfm, accessed: January 2017.*

[102] *Ibid.*

As shown in Table III-34, the Project would generate approximately 2.7 million pounds or 1,347 tons of C&D debris. Demolition and site clearing activities would occur over approximately one month (22 construction days, thereby generating approximately 52.4 tons per day. Building construction would occur over approximately 16 months, or 352 works day (22 work days per month), thereby generating approximately 0.6 tons per day.

This forecasted solid waste generation is a conservative estimate as it assumes no reductions in solid waste generation would occur due to recycling. In order to help meet the landfill diversion goals, the City adopted the Citywide C&D Waste Recycling Ordinance (Ordinance No. 181,519). This ordinance, which became effective January 1, 2011, requires that all haulers and contractors responsible for handling C&D waste obtain a Private Solid Waste Hauler Permit from the Bureau of Sanitation prior to collecting, hauling, and transporting C&D waste. It requires that all C&D waste generated within City limits be taken to City certified C&D waste processors, where the waste would be recycled to the extent feasible. Moreover, there are 58 million tons of remaining capacity available in Los Angeles County for the disposal of inert waste. Some C&D waste may also be landfilled at the Class III landfill identified above. Thus, Project-generated C&D waste would represent a very small percentage of the waste disposal capacity in the region, and, as noted, the aggregate amount estimated in the above table would not all be landfilled in compliance with City's recycling requirements to the extent feasible. Therefore, solid waste impacts from C&D activities would be less than significant and no mitigation measures are required. To ensure compliance with construction recycling standards, the following regulatory compliance measures are recommended.

Regulatory Compliance Measure

RCM 18-3. In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, the Applicant shall salvage and recycle construction and demolition materials to ensure that a minimum of 50 percent of construction-related solid waste that can be recycled is diverted from the waste stream to be landfilled. Solid waste diversion would be accomplished though the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 50 percent. In compliance with the Los Angeles Municipal Code, the General Contractor shall utilize solid waste haulers, contractors, and recyclers who have obtained an Assembly Bill (AB) 939 Compliance Permit from the City of Los Angeles Bureau of Sanitation.

Operational Impacts

The Project's estimated operational solid waste generation is presented in Table III-35, Estimated Project Operational Solid Waste.

Table III-35
Estimated Project Operational Solid Waste

Land Use	Size	Generation Rate[a]	Total Solid Waste Generated (lbs/Day)
Project:			
Residential	129 units	12.23 lbs/unit	1,578
Existing Uses:			
Commercial	40 emp[b]	10.53 lbs/emp	421
		Project Total:	**1,578**

Table III-35
Estimated Project Operational Solid Waste

Land Use	Size	Generation Rate[a]	Total Solid Waste Generated (lbs/Day)
		Less Existing Uses Total:	*421*
		Project Net Total:	**1,157**

Notes: sf = square feet; lbs = pounds; emp = employees

[a] *L.A. CEQA Thresholds Guide, 2006, page M.3-2.*

[b] *Conversion to employee rate based on a generation rate of 0.00271 employees per square foot (14,594 x 0.00271). Source: Los Angeles Unified School District, Developer Fee Justification Study, March 2014.*

Source (table): EcoTierra Consulting, 2016.

Waste generated in the City may also be diverted from landfills and recycled. In 2013, the City achieved a landfill diversion rate of 76.4 percent, which represents the highest recycling rate out of the 10 largest U.S. cities.[103] This landfill diversion rate exceeds the 75 percent diversion mandate by 2020 set forth in AB 374.[104] The Bureau of Sanitation's Solid Resources Citywide Recycling Division (SRCRD) develops and implements source reduction, recycling, and re-use programs in the City.[105] The SRCRD provides technical assistance to public and private recyclers, manages the collection and disposal programs for Household Hazardous Waste, and helps create markets for recycled materials.[106] Thus, at the City's diversion rate of 76.4 percent, the Project's net total of 1,157 pounds per day of solid waste would likely result in approximately 884 pounds being recycled and the remaining 273 pounds (0.14 tons) would be landfilled per day. Moreover, at the State-mandated minimum diversion rate of 75 percent, 868 pounds would be recycled and the remaining 289 pounds (0.14 tons) would be landfilled. As such, there is adequate landfill capacity for the Project's operational impact (see Table III-33, above). Furthermore, AB 341 requires multi-family residential developments with five units or more to provide for recycling services on site. Therefore, solid waste impacts from operation of the Project would be less than significant and no mitigation measures are required. To ensure compliance with operational recycling standards, the following regulatory compliance measures are recommended.

Regulatory Compliance Measure

RCM 18-4. In compliance with AB341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the proposed Project's regular solid waste disposal program. The Project Applicant shall only contract for waste

[103] *Los Angeles Bureau of Sanitation, Solid Resources, Recycling, website: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r, accessed: November 2016.*

[104] *California Department of Resources and Recycling, California's 75 Percent Initiative, website: http://www.calrecycle.ca.gov/75percent/, accessed: January 2016.*

[105] *Los Angeles Bureau of Sanitation, Solid Resources, Construction and Demolition Recycling Guide, website: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr, accessed: November 2016.*

[106] *Ibid.*

disposal services with a company that recycles solid waste in compliance with AB 341.

g) Would the project 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 Project would generate solid waste that is typical of a multi-family residential project, and would be consistent with all federal, State, and local statutes and regulations regarding proper disposal. As discussed under threshold question 8.b), above, the soil contaminated by PCE and TCE from the existing dry cleaner use would be suitably remediated in accordance with City and State regulatory requirements, which is required to be undertaken prior to issuance of any permits and to the satisfaction of LAFD. Additionally, the amount of solid waste that would be generated by the Project would be further reduced through source reduction and recycling programs (as required by AB 939 and AB 341). Therefore, the impact would be less than significant and no mitigation measures are required.

Cumulative Impacts

Water

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the topics listed in the water utilities analysis above, including water treatment facilities, infrastructure, and water supplies. The cumulative impacts study area for water utilities is the LADWP service area.

Implementation of the Project in combination with the related projects, along with other projects within the service area of LADWP, would generate demand for additional water supplies. In terms of the City's overall water supply condition, the water demand for any project that is consistent with the City's General Plan has been taken into account in the adopted 2015 UWMP. The 2015 UWMP anticipates that the future water supplies would be sufficient to meeting existing and planned growth in the City to the year 2040 (the planning horizon required of 2015 UWMPs) under wet and dry year scenarios. The Project would be consistent with the General Plan and the site's Community Plan land use designation, and therefore, has been taken into account in the 2015 UWMP. It is unknown whether or not the related projects or other development in the LADWP service area has been taken into account in the 2015 UWMP. Nonetheless, it can be assumed that any related projects that are not included in the 2015 UWMP would be required to identify water supplies prior to project approval. In addition, larger projects such as Related Project Nos. 3 and 7 (e.g., over 500 residential units) would have to prepare a Water Supply Assessment (pursuant to Senate Bill 610) to be reviewed and certified by LADWP to demonstrate adequate water supply. Therefore, the cumulative impact would be less than significant and no mitigation measures are required.

With respect to water treatment facilities, LAAFP has a remaining capacity of 304 mgd. Therefore, the LAAFP would have adequate capacity to serve the additional water demanded by the Project (which would consume 0.01 mgd) and the related projects. A less than significant cumulative impact would occur and no mitigation measures are required.

With respect to water infrastructure, the potential need for the related projects to upgrade water lines to accommodate their water needs is site-specific and there is little, if any, cumulative relationship between

the development of the Project and the related projects. As discussed above, the Project would have a less than significant impact on water infrastructure. Any upgrades to the related projects' water infrastructure would be required to be implemented by the applicants those projects. Therefore, the cumulative impact would be less than significant and no mitigation measures are required.

Wastewater

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the topics listed in the wastewater analysis above, including wastewater treatment requirements, facilities, and capacities. The cumulative impacts study area for wastewater utilities is the HTP service area.

Implementation of the Project in combination with the related projects and other projects within the service area of the HTP would generate additional wastewater that would be treated at HTP. Currently, the HTP as an average daily flow of 275 mgd in dry weather, which can double in wet weather; however, the HTP has capacity to treat a maximum daily flow of 450 mgd and peak wet weather flow of 800 mgd. This equals a typical remaining capacity of 175 mgd of wastewater able to be treated at the HTP. Therefore, the HTP would have adequate capacity to serve the additional wastewater demanded by the Project (0.01 mgd) and the related projects within the HTP service area. A less than significant cumulative impact would occur and no mitigation measures are required.

With respect to wastewater infrastructure, under the rules and regulations established in the City's Sewer Allocation Ordinance (Ordinance No. 166,060), the Bureau of Sanitation assesses the anticipated wastewater flows from development projects at the time of connection, and makes the appropriate decisions on how best to connect to the local sewer lines at the time of construction. The applicants for each of the related projects will be required to submit a Sewer Capacity Availability Request to verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines receiving additional sewer flows from the Project and other cumulative development projects. If it is determined that the sewer system in the local area has insufficient capacity to serve a particular development, the developer of that project may be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate that project's increased flows. Each project would be evaluated on a case-by-case basis and would be required to consult with the Bureau of Sanitation and comply with all applicable City and State water conservation programs and sewer allocation ordinances. Therefore, the cumulative impact would be less than significant and no mitigation measures are required.

Solid Waste

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 29 related projects (see Section II.5, Related Projects) with respect to the topics listed in the solid waste analysis above, including landfill capacity and compliance with solid waste statutes and regulations. The cumulative impacts study area for solid waste are the areas in the City served by the above-identified landfills.

Implementation of the Project in combination with the related projects and other projects within the Southern California region that are serviced by area landfills will increase regional demands on landfill capacities. Construction of the Project and related projects generate C&D waste, resulting in a cumulative increase in the demand for inert (unclassified) landfill capacity. Given the requirements of the Citywide C&D Debris Recycling Ordinance (Ordinance No. 181,519), which requires all mixed C&D waste generated within City limits be taken to a City-certified C&D waste processor, it is anticipated that future cumulative

development would also implement similar measures to divert C&D waste from landfills. Furthermore, as described above, the inert landfills do not face capacity issues, as 58 million tons of capacity remain for such waste in Los Angeles County, and thus, these landfills would be expected to have sufficient capacity to accommodate cumulative demand. Therefore, cumulative impacts from the C&D waste would be less than significant and no mitigation measures are required.

Operation of the Project in conjunction with the related projects would generate municipal solid waste and result in a cumulative increase in the demand for waste disposal capacity at Class III landfills. The countywide demand for landfill capacity is continually evaluated by Los Angeles County through preparation of the County Integrated Waste Management Plan Annual Reports. Each Annual Report assesses future landfill disposal needs over a 15-year planning horizon. As such, the 2015 Annual Report (published December 2016 and the most recent available) projects waste generation and available landfill capacity through 2030. Based on the 2015 Annual Report, Los Angeles County has the projected disposal capacity through 2030.[107] The Project's estimated net increase in operational solid waste generation, in conjunction with the related projects, would represent an insignificant portion of the estimated approximately 28.2 million tons that is anticipated to be generated in 2020 (Project build-out year).[108] Moreover, a State-mandated 75 percent landfill diversion rate is required by 2020, which would reduce the amount of solid waste being landfilled for the related projects. Therefore, cumulative impacts from operational solid waste would be less than significant and no mitigation measures are required.

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?

No Impact. For the purpose of this analysis, a significant impact could occur only if a project would have an identified potentially significant impact for any of the above issues, as discussed in the preceding sections.

The Project is located in an urbanized area and would have no significant and unavoidable impacts with respect to biological resources or cultural resources. The Project would not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, no impact would occur and no mitigation measures are 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

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[107] *Los Angeles County Department of Public Works, Countywide Integrated Waste Management Plan, 2014 Annual Report, published December 2015, page 7, website: http://dpw.lacounty.gov/landing/wasteManagement.cfm, accessed: January 2016*

[108] *Ibid, Appendix E-2 Table 5.*

when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. For the purpose of this analysis, a significant impact could occur if a project, in conjunction with other projects in the area of the project site, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together.

As concluded throughout this IS/MND, the cumulative impact related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology and soils, GHG gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation and traffic, tribal cultural resources, and utilities would be less than significant. No mitigation measures are required.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. For the purpose of this analysis, a significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections.

The analysis contained in this IS/MND concludes that the Project would not result in significant and unavoidable adverse effects after implementation of mitigation measures, where appropriate. Therefore, this impact would be less than significant and no additional mitigation measures are required.

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V. ACRONYMS & ABBREVIATIONS

AB	Assembly Bill
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
ATCS	Adaptive Traffic Control System
ATSAC	Automated Traffic Surveillance and Control
Basin	South Coast Air Basin
BBB	Big Blue Bus
BMPs	Best Management Practices
C&D	Construction and demolition
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CDO	Community Design Overlay District
CEQA	California Environmental Quality Act
City	City of Los Angeles, California
CMA	Critical Movement Analysis
CMP	Congestion Management Program
CWC	California Water Code
DTSC	California Department of Toxic Substances Control
ESA	Environmental Site Assessment
ESCP	Erosion and Sediment Control Plan
FAR	Floor-to-area ratio
FEMA	Federal Emergency Management Agency
FTA	Federal Transit Administration
GHG(s)	Greenhouse gas(ses)
HFCs	Hydrofluorocarbons
HTP	Hyperion Treatment Plant

HVAC	Heating, ventilation, and air conditioning
ITE	Institute of Transportation Engineers
LAAFP	Los Angeles Aqueduct Filtration Plant
LADBS	City of Los Angeles Department of Building and Safety
LADOT	City of Los Angeles Department of Transportation
LADRP	City of Los Angeles Department of Recreation and Parks
LADWP	City of Los Angeles Department of Water and Power
LAFD	City of Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	City of Los Angeles Police Department
LAPL	Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LCFS	Low Carbon Fuel Standards
LID	Low Impact Development
LOS	Level of Service
LSTs	Localized Significance Thresholds
MBTA	Migratory Bird Treaty Act
Metro	Los Angeles County Metropolitan Transportation Authority
MLD	Most Likely Descendent
MOU	Memorandum of Understanding
MPOs	Metropolitan Planning Organizations
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
NPDES	National Pollution Discharge Elimination System
PFCs	Perfluorocarbons
RCP	Regional Comprehensive Plan

RECs	Recognized Environmental Conditions
RPS	Renewables Portfolio Standard
ROG	Reactive organic gases
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coast Information Center
SOPA	Society of Professional Archaeologists
SRA	Source Receptor Area
SRCRD	Solid Resources Citywide Recycling Division
SUSMP	Standard Urban Stormwater Mitigation Plan
SWRCB	State Water Resources Control Board
TCR	Tribal Cultural Resources
TDM	Transportation Demand Management
TMO	Transportation Management Office
TPA	Transit Priority Area
UWMP	Urban Water Management Plan
WLA TIMP	West Los Angeles Transportation Improvement and Mitigation Specific Plan

Chemical Symbols and Measurement Abbreviations

AF/Y	Acre-feet per year
CH_4	Methane
CNEL	Community Noise Equivalent Level
CO	Carbon monoxide
CO_2	Carbon dioxide
CO_2e	Carbon dioxide equivalents
dBA	A-weighted decibel
gpd	Gallons per day

gpm	Gallons per minute
H_2O	Water vapor
lbs	Pounds
mgd	Million gallons per day
$MTCO_2e$	Metric tons of carbon dioxide equivalent
N_2O	Nitrous oxide
NO_X	Nitrogen Oxides
O_3	Ozone
PCE	Tetrachloroethene
PM_{10}	Respirable Particulate Matter
$PM_{2.5}$	Fine Particulate Matter
ppm	Parts per million
PPV	Peak particle velocity
PSI	Pounds per square inch
RMS	Root mean square
sf	Square feet
SF_6	Sulfur hexafluoride
SO_X	Sulfur Oxides
TCE	Trichloroethene
V/C	Volume-to-capacity
VdB	Velocity in decibels
VMT	Vehicles miles traveled
VPD	Vehicles per day
VPH	Vehicle per hour
vphpl	Vehicles per hour per lane

MITIGATION MONITORING PROGRAM

Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a "reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment" (Mitigation Monitoring Program, Section 15097 of the *CEQA Guidelines* provides additional direction on mitigation monitoring or reporting). This Mitigation Monitoring Program (MMP) has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6, and Section 15097 of the CEQA Guidelines. The City of Los Angeles is the Lead Agency for this project.

A Mitigated Negative Declaration (MND) has been prepared to address the potential environmental impacts of the Project. Where appropriate, this environmental document identified Project design features, regulatory compliance measures, or recommended mitigation measures to avoid or to reduce potentially significant environmental impacts of the Proposed Project. This Mitigation Monitoring Program (MMP) is designed to monitor implementation of the mitigation measures identified for the Project.

The MMP is subject to review and approval by the City of Los Angeles as the Lead Agency as part of the approval process of the project, and adoption of project conditions. The required mitigation measures are listed and categorized by impact area, as identified in the MND.

The Project Applicant shall be responsible for implementing all mitigation measures, unless otherwise noted, and shall be obligated to provide documentation concerning implementation of the listed mitigation measures to the appropriate monitoring agency and the appropriate enforcement agency as provided for herein. All departments listed below are within the City of Los Angeles unless otherwise noted. The entity responsible for the implementation of all mitigation measures shall be the Project Applicant unless otherwise noted.
As shown on the following pages, each required mitigation measure for the proposed Project is listed and categorized by impact area, with accompanying discussion of:

Enforcement Agency – the agency with the power to enforce the Mitigation Measure.

Monitoring Agency – the agency to which reports involving feasibility, compliance, implementation and development are made, or whom physically monitors the project for compliance with mitigation measures.

Monitoring Phase – the phase of the Project during which the Mitigation Measure shall be monitored.

- Pre-Construction, including the design phase
- Construction
- Pre-Operation
- Operation (Post-construction)

Monitoring Frequency – the frequency of which the Mitigation Measure shall be monitored.

Action Indicating Compliance – the action of which the Enforcement or Monitoring Agency indicates that compliance with the required Mitigation Measure has been implemented.

The MMP performance shall be monitored annually to determine the effectiveness of the measures implemented in any given year and reevaluate the mitigation needs for the upcoming year.

It is the intent of this MMP to:

Verify compliance of the required mitigation measures of the MND;

Provide a methodology to document implementation of required mitigation;

Provide a record and status of mitigation requirements;

Identify monitoring and enforcement agencies;

Establish and clarify administrative procedures for the clearance of mitigation measures;

Establish the frequency and duration of monitoring and reporting; and

Utilize the existing agency review processes' wherever feasible.

This MMP shall be in place throughout all phases of the proposed Project. The entity responsible for implementing each mitigation measure is set forth within the text of the mitigation measure. The entity responsible for implementing the mitigation shall also be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that compliance with the required mitigation measure has been implemented.

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made by the Applicant or its successor subject to the approval by the City of Los Angeles through a public hearing. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. The flexibility is necessary in light of the proto-typical nature of the MMP, and the need to protect the environment with a workable program. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

MITIGATION MONITORING PROGRAM

Biology

Biological Resources (Significant and Protected Tree Removal). Removal or planting of trees in the public right-of-way and/or removal of all protected trees shall require approval by the Board of Public Works and the Advisory Agency in the course of reviewing and approving the Vesting Tentative Tract Map, and shall adhere to the following measures:

- Prior to the issuance of any permit, the required Tree Report and plot plan shall indicate the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way and shall be submitted for review and approval to the Urban Forestry Division of the Bureau of Street Services, Department of Public Works.

Regarding the Significant Street Trees:

- All significant trees (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) on the site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree.
- A Landscape Plan shall be prepared, indicating the location of all replacement trees, to the satisfaction of the decision-maker. Net, new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.
- All trees in the public right-of-way shall be provided per the current standards of the Urban Forestry Division of the Department of Public Works, Bureau of Street Services.

Regarding the Protected On-Site Trees:

- A minimum of two (2) trees (each with a minimum of 15 gallons measuring 1-inch in diameter and at least 7 feet in height measured from the base) of a protected species variety shall be planted for each protected tree that is removed. The canopy of the replacement trees, at the time they are planted, shall be in proportion to the canopies of the protected trees removed and shall be to the satisfaction of the Advisory Agency and the Urban Forestry Division.
- The location of the trees planted for the purposes of replacing a removed protected tree shall be clearly indicated on the required Landscape Plan, which shall also indicate the replacement tree species and further contain the phrase “Replacement Tree” in its description.
- The Project Applicant shall post a cash bond or other assurances acceptable to the Bureau of Engineering in consultation with the Urban Forestry Division and the decision-maker guaranteeing the survival of trees required to be maintained, replaced, or relocated in such a fashion as to assure the existence of continuously living trees for a minimum of three (3) years from the date that the bond is posted or from the date such trees are replaced or relocated, whichever is longer. Any change of ownership shall require that the new owner post a new protected tree bond to the satisfaction of the Bureau of Engineering. Subsequently, the original owner’s protected tree bond may be exonerated.

The City Engineer shall use the provisions of Section 17.08 as its procedural guide in satisfaction of said bond requirements and processing. Prior to exoneration of the bond, the owner of the property shall provide evidence satisfactory to the City Engineer and Urban Forestry Division that the protected trees were properly replaced, the date of the replacement, and the survival of the replacement trees for a period of three (3) years.

Enforcement Agency: Board of Public Works Urban Forestry Division
Monitoring Agency: Board of Public Works Urban Forestry Division
Monitoring Phase: pre-construction
Monitoring Frequency: Once, at plan check, and once at field inspection
Action Indicating Compliance: Issuance of Certificate of Occupancy

Transportation and Traffic

Transportation/Traffic (Hazards). The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times. Specifically, this measure shall include the following:

- Temporary pedestrian facilities shall be adjacent to the Project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

Enforcement Agency: Los Angeles Department of Building and Safety, LADOT, BOE
Monitoring Agency: Los Angeles Department of Building and Safety, LADOT
Monitoring Phase: Construction
Monitoring Frequency: Ongoing
Action Indicating Compliance: Issuance of Certificate of Occupancy