



## Reese Davidson Community Project

Case Number: ENV-2018-6667-EIR

**Project Location:** 2102–2120 S. Pacific Avenue, 116–128 E. North Venice Boulevard, 204–216 E. North Venice Boulevard, 302 E. North Venice Boulevard, 125 E. South Venice Boulevard, 301–319 E. South Venice Boulevard, and 2106–2116 S. Canal Street, Los Angeles, CA 90291

**Community Plan Area:** Venice

**Council District:** 11—Bonin

**Project Description:** The Reese Davidson Community Project (Project) proposes a new mixed-use development on an approximate 115,674 square-foot site (Project Site; also referred to as West Site or East Site as located adjacent to a segment of the Grand Canal, which traverses the Project Site) located in the Venice Community Plan area of the City of Los Angeles (City). The Project would provide a total of 140 residential units, which would consist of up to 136 affordable and permanent supportive housing units, along with up to four units for on-site property management staff, and 685 square feet of associated affordable resident services to be operated by a non-profit entity. The Project would also provide 3,155 square feet of community arts/community meeting space as well as 4,565 square feet for retail/restaurant uses. The retail/restaurant uses also include 500 square feet of outdoor seating. These new uses would be located in two, three-story buildings with an approximate height of 35 feet. A 59-foot architectural campanile would be located at the corner of North Venice Boulevard and Pacific Avenue. Parking for all residential uses on the Project Site, as well as commercial uses, would be provided on the West Site and would include up to 143 vehicular parking spaces. In addition, up to 293 vehicular parking spaces would be provided in a public parking structure on the East Site and would include the replacement parking for the existing public surface parking spaces, as well as beach impact parking. The public parking structure would be operated by the City's Department of Transportation (LADOT). The parking structures would reach a maximum height of 35 feet and would be wrapped by the proposed uses. The existing surface parking lot, currently owned and operated by LADOT, and the existing two-story, multi-family residential building located on the northern portion of the Project Site, would be removed. Upon completion, 105,770 square feet of floor area would be located within the Project Site, resulting in a maximum floor area ratio (FAR) of 1.17:1.

**PREPARED FOR:**

The City of Los Angeles  
Department of City Planning

**PREPARED BY:**

Eystone Environmental

**APPLICANT:**

Venice Community Housing Corp./Hollywood Community Housing Corp.

**December 2018**

# INITIAL STUDY

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## Executive Summary

**Date:** December 18, 2018

**Project Title:** Reese Davidson Community Project

**Environmental Case Number:** ENV-2018-6667-EIR

**Related Cases:** N/A

**Project Location:** 2102–2120 S. Pacific Avenue, 116–128 E. North Venice Boulevard, 204–216 E. North Venice Boulevard, 302 E. North Venice Boulevard, 125 E. South Venice Boulevard, 301–319 E. South Venice Boulevard, and 2106–2116 S. Canal Street, Los Angeles, CA 90291

**Community Plan Area:** Venice

**Council District:** 11

**Lead City Agency:** City of Los Angeles Department of City Planning

**Staff Contact Name and Address:** Johnny Le, 221 Figueroa St., Ste. 1350, Los Angeles, CA 90012

**Phone Number:** (213) 847-3741

**Applicant Name and Address:** Venice Community Housing Corp., 720 Rose Avenue, Venice, CA 90291 and Hollywood Community Housing Corp., 5020 Santa Monica Boulevard, Los Angeles, CA 90029

**Phone Number:** (310) 399-1130/(323) 469-0710

**General Plan Designation:** Open Space

**Zoning:** OS-1XL-O (Open Space, Height District 1XL, Oil Drilling District)

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### PROJECT DESCRIPTION:

The Reese Davidson Community Project (Project) proposes a new mixed-use development on an approximate 115,674 square-foot site (Project Site; also referred to as West Site or East Site as located adjacent to a segment of the Grand Canal, which traverses the Project Site) located in the Venice Community Plan area of the City of Los Angeles (City). The Project would provide a total of 140 residential units, which would consist of up to 136 affordable and permanent supportive housing units, along with up to four units for on-site property management staff, and 685 square feet of associated affordable resident services to be operated by a non-profit entity. The Project would also provide 3,155 square feet of community arts/community meeting space as well as 4,565 square feet for retail/restaurant uses. The retail/restaurant uses also include 500 square feet of outdoor seating. These new uses would be located in two three-story buildings with an approximate height of 35 feet. A 59-foot architectural campanile would be located at the corner of North Venice Boulevard and Pacific Avenue. Parking for all residential uses on the Project Site as well as commercial uses would be provided on the West Site and would include up to 143 vehicular parking spaces. In addition, up to

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293 vehicular parking spaces would be provided in a public parking structure on the East Site and would include the replacement parking for the existing surface parking spaces, as well as beach impact parking. The public parking structure would be operated by the City's Department of Transportation (LADOT). The parking structures would reach a maximum height of 35 feet and would be wrapped by the proposed uses. The existing surface parking lot, currently owned and operated by LADOT, and the existing two-story, multi-family residential building located on the northern portion of the Project Site, would be removed. Upon completion, 105,770 square feet of floor area would be located within the Project Site, resulting in a maximum floor area ratio (FAR) of 1.17:1.

For additional detail, refer to Attachment A, Project Description.

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**ENVIRONMENTAL SETTING:**

The Project Site is located in the Venice Community Plan area of the City of Los Angeles. The approximately 115,674 square-foot Project Site is specifically bounded by North Venice Boulevard to the north, South Venice Boulevard to the south, Pacific Avenue to the west, and Dell Avenue to the east. A segment of the Grand Canal, which is a part of the Venice Canals, also traverses the Project Site, on the western portion of the Project Site. A bridge connects the eastern and western portions of the Project Site. The Pacific Ocean is located less than a quarter of a mile from the Project Site, to the east. The Project vicinity is developed with a mix of commercial and residential uses.

For additional detail, refer to Attachment A, Project Description.

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**Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?**

No; consultation has not yet commenced.

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**Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement.):**

N/A

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**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.

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

**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.
- 
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Milena Zasadzien  
PRINTED NAME

  
SIGNATURE

City Planner  
TITLE

(213) 847-3636  
TELEPHONE NUMBER

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## 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 than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an 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 significance.

## **A. Project Description**

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# INITIAL STUDY

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## Attachment A: Project Description

### A. Project Summary

The Reese Davidson Community Project (Project) proposes a new mixed-use development on an approximate 115,674 square-foot site (Project Site) located in the Venice Community Plan area of the City of Los Angeles (City). The northernmost section of the Venice Canal system (also known as the Grand Canal), traverses the Project Site and bisects the Project Site into two portions. These areas of the Project Site are referred to herein as the West Site and East Site. The Project would provide a total of 140 residential units, which would consist of up to 136 affordable and permanent supportive housing units, along with up to four units for on-site property management staff, and 685 square feet of associated affordable resident services<sup>1</sup> to be operated by a non-profit entity. The Project would also provide 3,155 square feet of community arts/community meeting space as well as 4,565 square feet for retail/restaurant uses. The retail/restaurant uses also include 500 square feet of outdoor seating. These new uses would be located in two three-story buildings with an approximate height of 35 feet. A 59-foot architectural campanile would be located at the corner of North Venice Boulevard and Pacific Avenue. Parking for all residential uses on the Project Site as well as commercial uses would be provided on the West Site and would include up to 143 vehicular parking spaces. In addition, up to 293 vehicular parking spaces would be provided in a public parking structure on the East Site and would include the replacement parking for the existing surface parking spaces, as well as beach impact parking. The public parking structure would be operated by the City's Department of Transportation (LADOT). The parking structures would reach a maximum height of 35 feet and would be wrapped by the proposed uses. The existing surface parking lot, currently owned and operated by LADOT, and the existing two-story, multi-family residential building located on the northern portion of the Project Site, would be removed. Upon completion, 105,770 square feet of floor area would be located within the Project Site, resulting in a maximum floor area ratio (FAR) of 1.17:1.<sup>2</sup>

### B. Environmental Setting

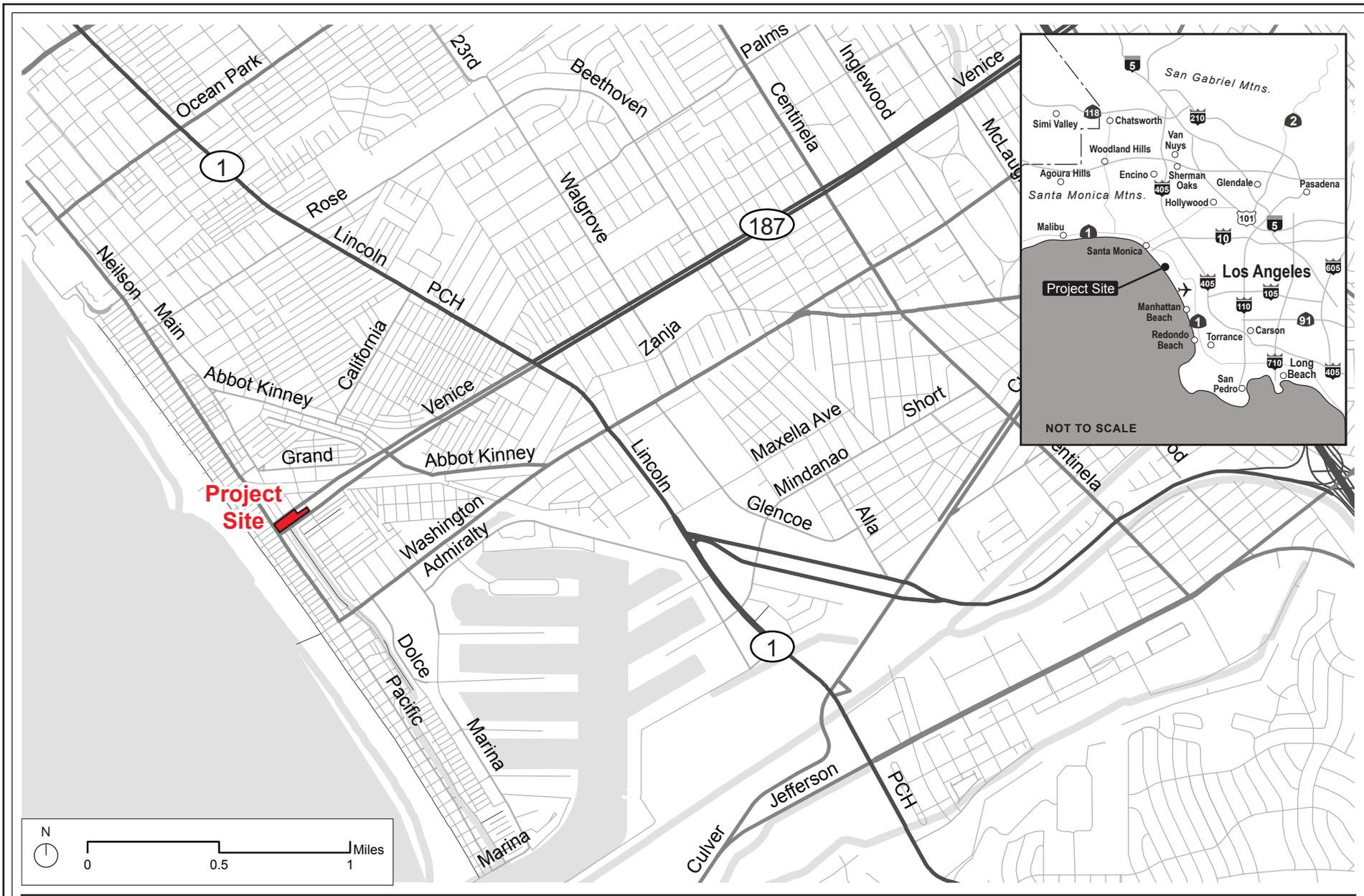
#### 1. Project Location

As shown in Figure A-1 on page A-2, the Project Site is located in the Venice Community Plan area of the City of Los Angeles (City), less than 0.25 miles east of the Pacific Ocean. The

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<sup>1</sup> These services include counseling services.

<sup>2</sup> FAR is based on buildable area of 90,573 square feet.



**Figure A-1**  
Project Location Map

Source: Los Angeles County GIS, 2015; Eyestone Environmental, 2018.

approximate 2.7-acre Project Site is bounded by North Venice Boulevard to the north, South Venice Boulevard to the south, Pacific Avenue to the west, and Dell Avenue to the east. Primary regional access is provided by State Route 90 (SR-90), Venice Boulevard (SR-187), and Lincoln Boulevard (SR-1), which are all accessible within 1.5 miles the Project Site. Major arterials providing regional access to the Project Site include Pacific Avenue, West Washington Boulevard, and Abbot Kinney Boulevard.

## 2. Existing Uses

### a. Existing Project Site Conditions

As shown in Figure A-2 on page A-4, the Project Site is currently developed with surface parking containing 188 vehicular parking spaces, and a two-story, 2,072 square-foot residential building containing four dwelling units, located on the northern portion of the Project Site. Vehicular access to the Project Site is currently available at driveways along North Venice Boulevard, Dell Avenue, and South Venice Boulevard. The Project Site is relatively flat with limited ornamental landscaping that includes 11 street trees (5 of which appear to be dead) and 24 on-site trees located along the public right-of-way.<sup>3</sup> As further shown in Figure A-2, the northernmost section of the Venice Canal system (also known as the Grand Canal), traverses the Project Site and bisects the Project Site into two portions. These areas of the Project Site are referred to herein as the West Site and East Site.

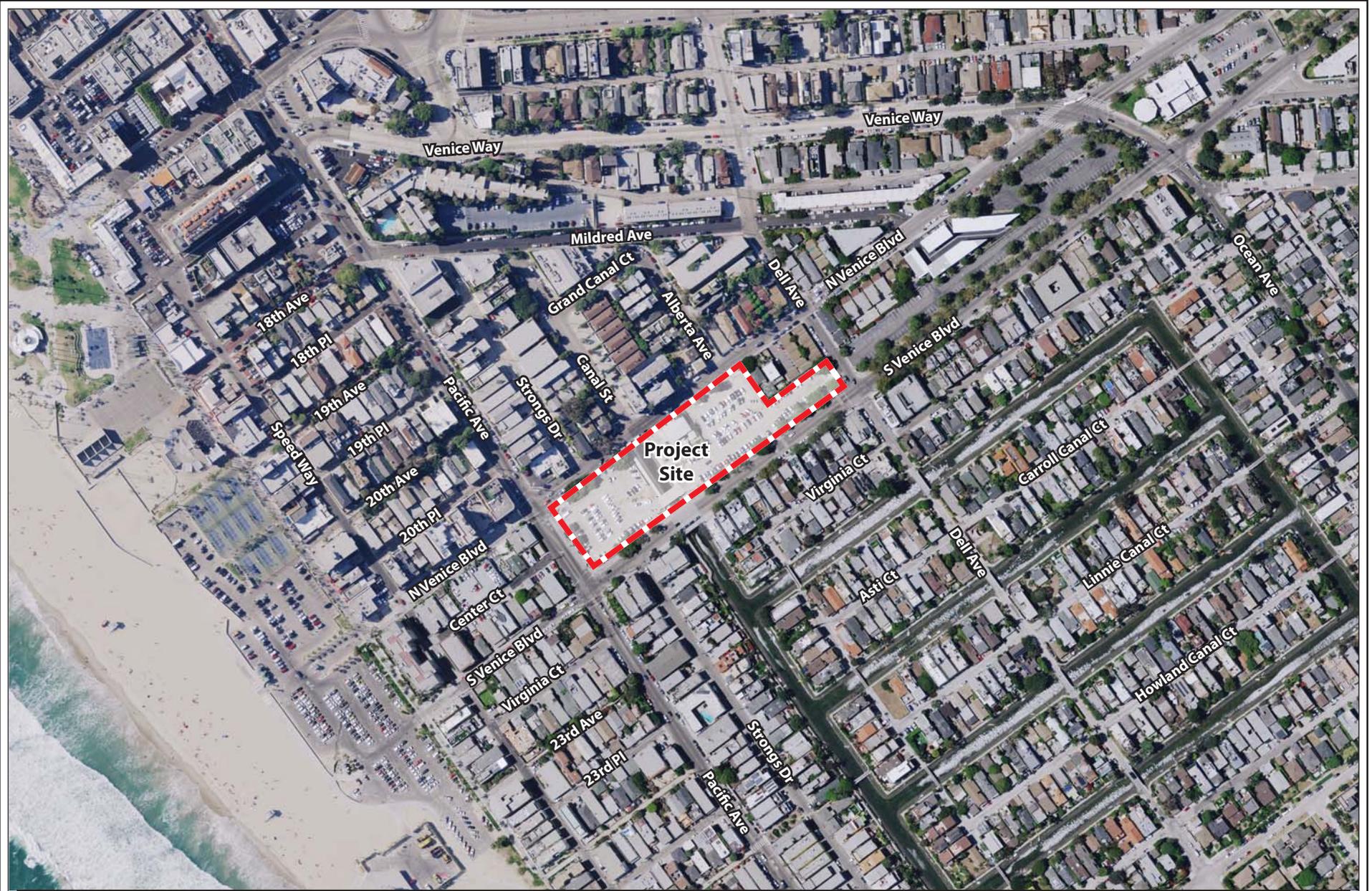
### b. Land Use and Zoning

The Project Site is located within the planning boundary of the Venice Community Plan (Community Plan), adopted in September 2000. The Project Site has a General Plan land use designation of Open Space and is zoned OS-1XL-O (Open Space, Height District 1XL, Oil Drilling District). The OS designation indicates that the Project is located in an Open Space zone, which permits parks and recreation facilities; natural resources preserves, marine and ecological preserves, sanctuaries and habitat protection sites; sanitary landfill sites; public water supply reservoirs; and water conservation areas. The “1XL” indicates that the Project Site is located in Height District 1XL, which specifies a building height limit of 30 feet. The “O” designation is for the City’s Oil Drilling (O) district, which is designed for areas where the drilling of oil wells or the production from the wells of oil, gases or other hydrocarbon substances is permitted.

The Project Site is also located within the Los Angeles Coastal Transportation Corridor Specific Plan and the Venice Coastal Zone Specific Plan. In addition, the Zoning Information (ZI) 2406 Director’s Interpretation of the Venice SP for Small Lot Subdivision and ZI-2471 Coast Zone, apply to the Project Site. The Project Site is also located within a Transit Priority Area (TPA) pursuant to Senate Bill (SB) 743. SB 743 [Public Resources Code (PRC) Section 21099(d)], sets forth new guidelines for evaluating project impacts under CEQA, as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment.” PRC Section 21099 applies to the Project as

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<sup>3</sup> The Tree Resource, Tree Report, February 2018. See Appendix IS-1, of this Initial Study.



**Figure A-2**  
Aerial Photograph of the Project Vicinity

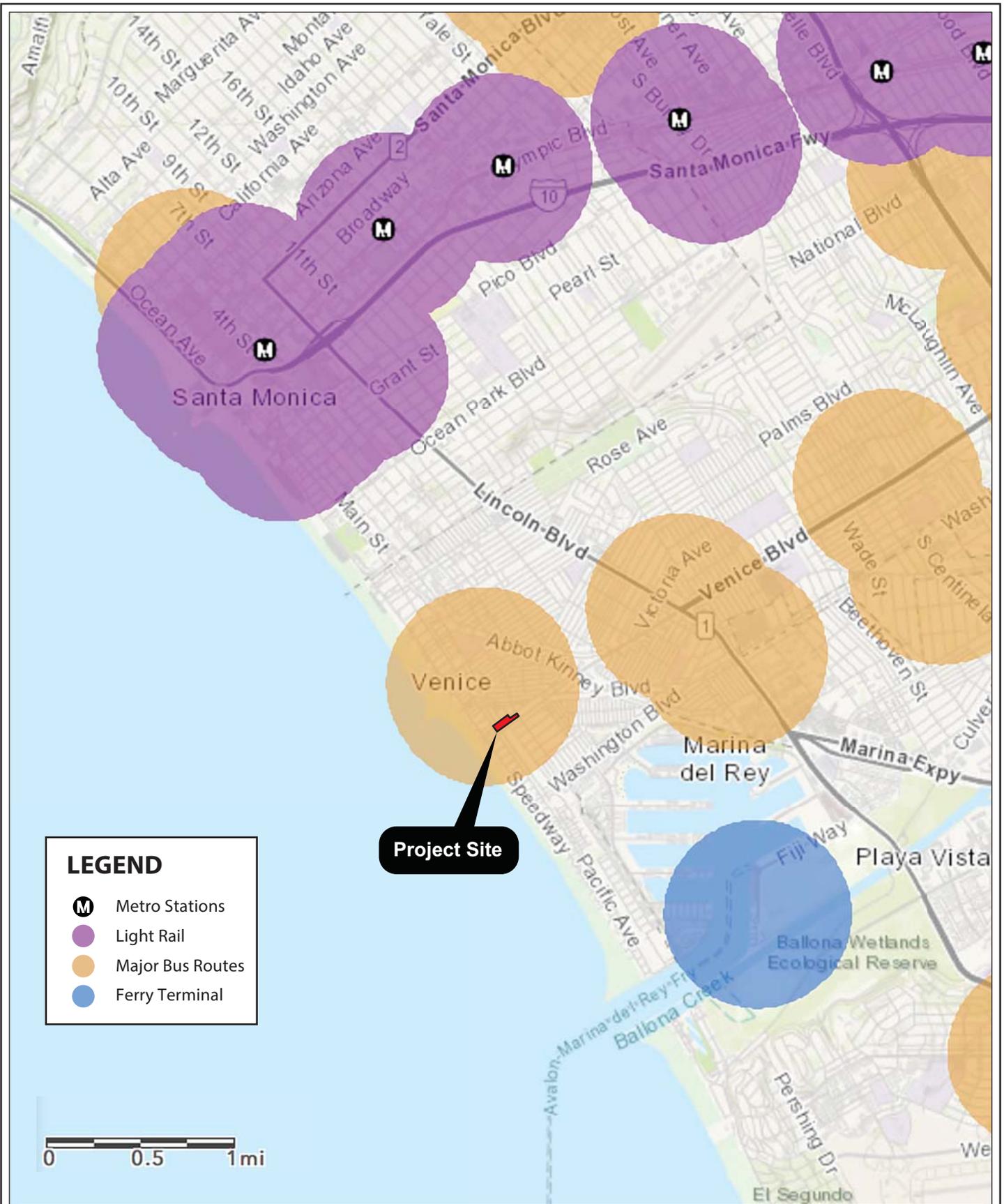
the Project is a residential development that meets PRC Section 21099's definition of an infill site as a lot located within an urban area that has been previously developed. Therefore, as shown in Figure A-3 on page A-6, the Project is located in a TPA pursuant to SB 743 and as defined by the City of Los Angeles Department of City Planning ZI No. 2452.<sup>4</sup>

### 3. Surrounding Land Uses

The Project Site is located at the northern boundary of the Venice Canal system, which are Italian-inspired artificial canals built in 1905. As shown in Figure A-2 on page A-4, uses within the vicinity of the Project Site include a mix of low- to mid-rise commercial and residential uses. Single-family and multi-family residential uses are located north, east, and south of the Project Site along North Venice Boulevard, Dell Avenue, and South Venice Boulevard. There are residential uses adjacent to the Project Site at the southwest corner of North Venice Boulevard and Dell Avenue. Residential uses include two low-rise single-family dwelling units and nine single-story multi-family residential units. Public parking is located directly east of the Project Site across Dell Avenue. Commercial uses are predominately located west of the Project Site along Pacific Avenue. These commercial uses include restaurants, retail, and art galleries. Public parking, the beach, and the Pacific Ocean are located just beyond the commercial uses, west of the Project Site.

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<sup>4</sup> City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed November 27, 2017.



**Figure A-3**  
 Location of Project Site  
 within a Transit Priority Area

# C. Description of the Project

## 1. Project Overview

The Project proposes a new mixed-use development consisting of 140 residential units, 685 square feet of associated affordable resident services to be operated by a non-profit entity, 3,155 square feet of space designated for community arts/community meeting spaces, and 4,565 square feet of space designated for retail/restaurant uses. The retail/restaurant uses also include 500 square feet of outdoor seating. The new uses would be located within two three-story buildings with an approximate height of 35 feet. A 59-foot architectural campanile would be located at the corner of North Venice Boulevard and Pacific Avenue. Parking for all residential uses on the Project Site as well as commercial uses would be provided on the West Site and would include up to 143 vehicular parking spaces. In addition, up to 293 vehicular parking spaces would be provided in a public parking structure on the East Site to replace existing surface parking spaces and would be operated by LADOT. To accommodate the new uses, the existing surface parking lot and multi-family residential building would be removed.

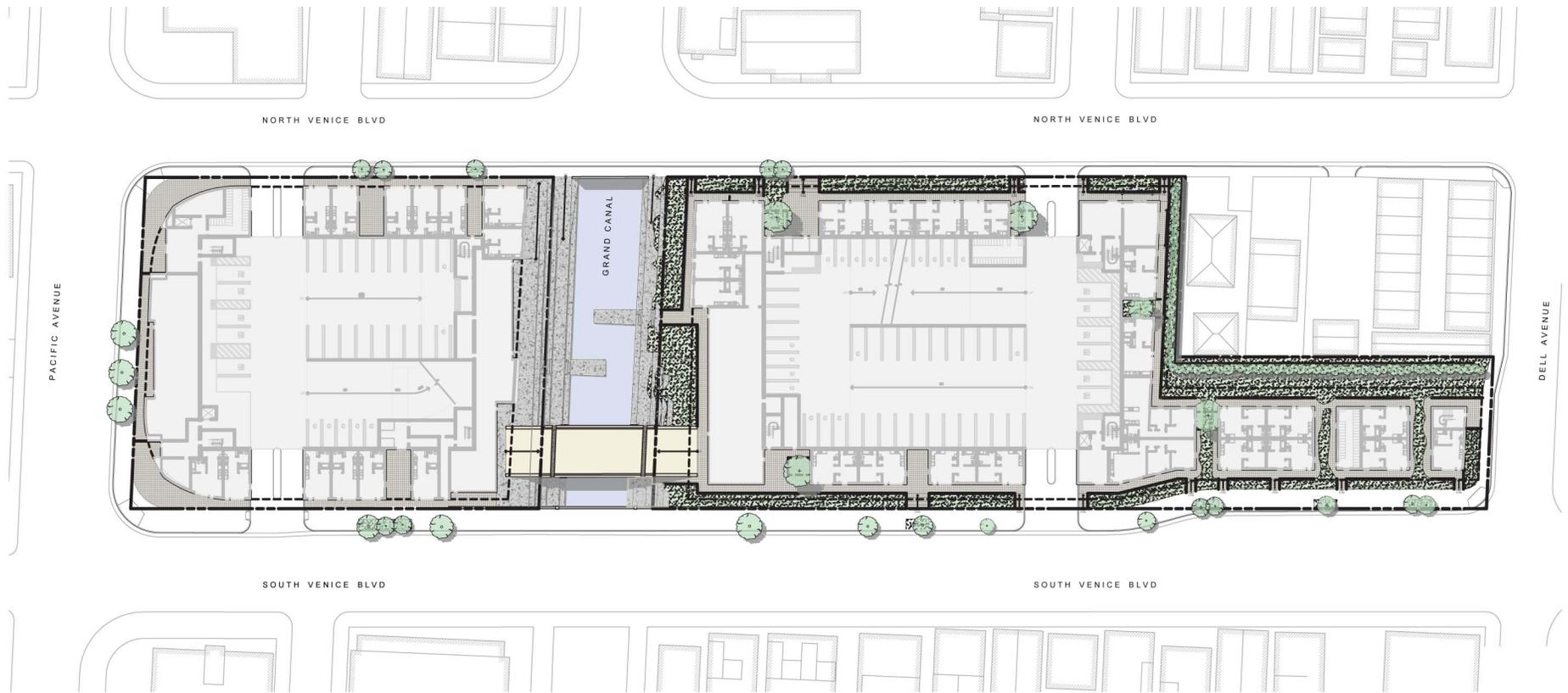
As discussed above, and shown in Figure A-2 on page A-4, a segment of the Grand Canal traverses the Project Site and bisects the Project Site into two portions, which are referred to herein as the West Site and East Site. The West Site of the Project Site would include one building that would contain residential uses, common areas, affordable resident services, and retail uses (West Building). These uses would comprise a total of approximately 36,405 square feet of floor area. The West Building would be three stories and reach a height of 35 feet, except for the northwestern corner of the Project Site at the corner of Pacific Avenue and North Venice Boulevard, which would be five stories and reach a height of 59 feet.<sup>5</sup> The uses in the West Building would surround a three-level parking structure with a partially below grade level that would reach a height of 35 feet.

The East Site of the Project Site would be developed similar to the West Site of the Project Site, except that the East Building would include community arts/community meeting spaces and would not include retail uses. These uses would comprise a total of approximately 69,365 square feet of floor area. Similar to the West Building, the East Building would also be three stories and reach a height of 35 feet. The uses in the East Building would surround a four-level parking structure with a partially below grade level that would reach a height of 35 feet. This would be a public parking structure which would replace existing surface parking lot and would be operated by LADOT. Figure A-4 on page A-8 provides further detail on the proposed building footprints for the West Building and East Building.

The residential component of the Project would consist of 68 units reserved for low-income formerly homeless households (permanent supportive housing); 34 affordable units for low-income artists; 34 affordable units for lower-income households; and 4 units for on-site property management staff.

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<sup>5</sup> Note that maximum heights of 35 and 59 feet are exclusive of rooftop railings/guardrails, elevator shafts, and/or roof projections.



**Figure A-4**  
Conceptual Site Plan

Overall, as shown in Table A-1 on page A-10, the Project would contain 34 artist live/work units, 51 studio units, 32 one-bedroom units, and 23 two-bedroom units. Generally, the artist live/work and some two-bedroom units would be located on the ground floor, while a mix of studio, one-bedroom, and two-bedroom units would be provided throughout the second and third floors. Residential units would range from 275 square feet to 902 square feet in size.

Various residential amenities, including lobby space, laundry rooms, and common areas would be provided throughout the proposed buildings. Lobby uses would be provided on the ground floor, with laundry rooms provided on the second floor in both the West Building and East Building. Common areas would be provided in the architectural campanile located on the northwestern portion of the West Building, which includes the 4th and 5th floors of the West Building,<sup>6</sup> and on the second floor of the East Building.

As discussed above, the Project would also include 685 square feet of associated affordable resident services to be operated by a non-profit entity. Affordable resident services would include counseling services. These uses would be provided on the ground floor of both the West Building and the East Building. The Project would also include 3,155 square feet of space designated for community arts/community meetings. These uses would be provided in the East Building and would be located on the ground floor in the western part of the building, facing the Grand Canal. In addition, the Project would include 4,565 square feet of retail/restaurant uses, including an approximately 500-square-foot café, which would also include 500 square feet of outdoor seating, for a total of 1,000 square feet. These uses would be provided on the ground floor in the West Building in the western part of the building facing Pacific Avenue as well as the eastern part of the building, facing the Grand Canal. Further detail of the ground floor uses is provided in Figure A-5 on page A-11.

With a buildable area of 90,573 square feet, a 1.5:1 FAR would permit a total of 140,346 square feet of floor area within the Project Site. As set forth above, the Project proposes a floor area of 105,770 square feet. Thus, the Project's proposed floor area of 105,770 square feet would be well within the permitted FAR of 1.5:1 under the proposed [T][Q]C2-1L-O Zone.

## 2. Design and Architecture

As discussed above, a segment of the Grand Canal bisects the Project Site. The banks of the Grand Canal would feature new hardscape and landscape to increase access to the canal and provide outdoor amenities to the Project residents and the public. The existing vehicular bridge connecting the West Site and East Site of the Project Site would remain and would be improved to facilitate pedestrian and bicycle movement across the Project Site and would no longer be used for vehicular circulation.

The massing of the residential buildings would be articulated with a wide range of configurations. The buildings would range in height, and several of the ground level facades of the buildings would be recessed to provide large landscaped pedestrian areas along the sidewalk. Units

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<sup>6</sup> As a note, the fourth and fifth floors on the Project Site are only located in the architectural campanile.

**Table A-1  
Summary of Proposed Floor Area<sup>a</sup>**

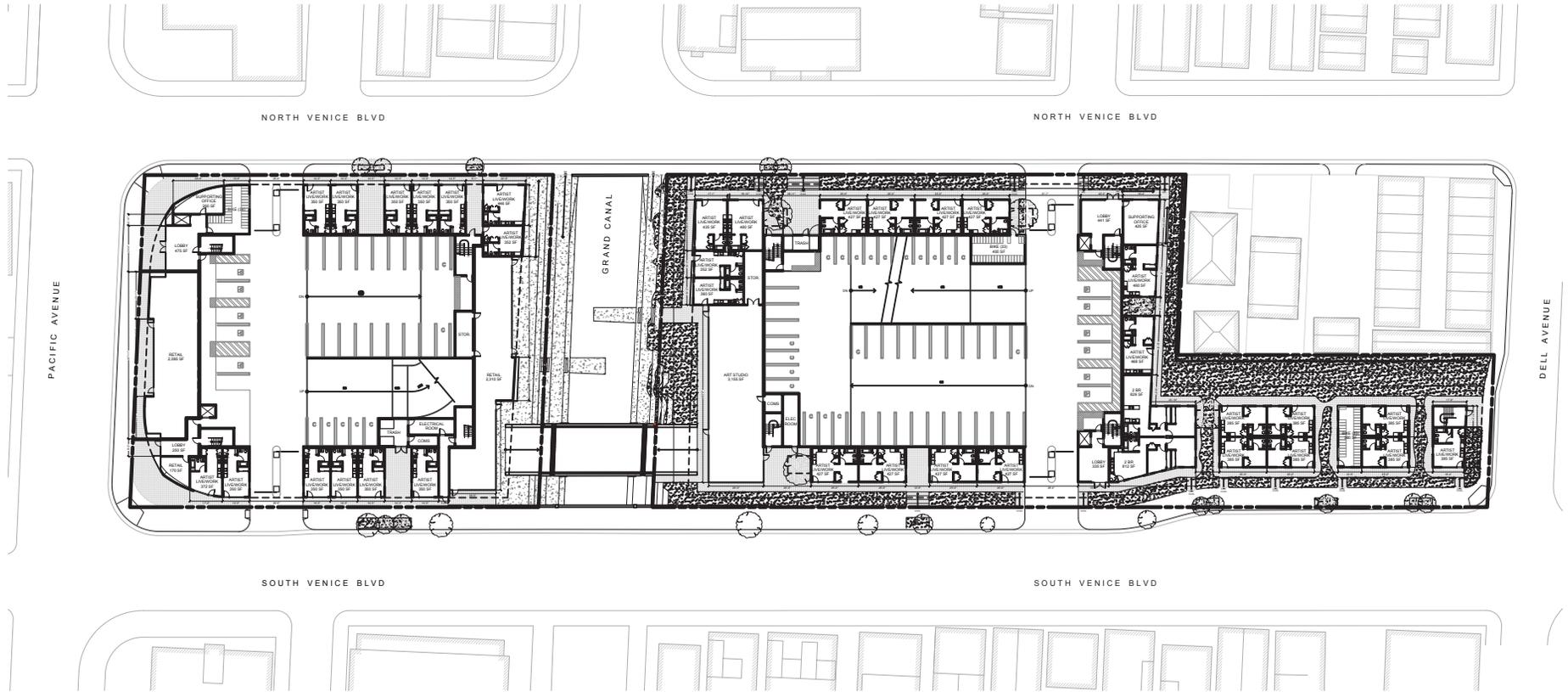
Land Use	Existing Development	Proposed New Development
Multi-Family Residences	4 du (2,072 sf)	—
Artist Live/Work	—	34 du (13,610 sf)
Studio	—	51 du (15,345 sf)
1-Bedroom	—	32 du (17,335 sf)
2-Bedroom	—	23 du (18,120 sf)
Affordable Resident Services	—	685 sf
Retail/Restaurant	—	4,565 sf <sup>b</sup>
Community Arts/Community Meeting Spaces	—	3,155 sf
Common Area and Exterior Walkways (covered)	—	32,955 sf
<b>Total</b>	<b>2,072 sf</b>	<b>105,770 sf</b>
<p><i>sf = square feet</i>  <i>du = dwelling units</i></p> <p><sup>a</sup> <i>Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as “[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas.”</i></p> <p><sup>b</sup> <i>The retail/restaurant land use includes 500 square feet of outdoor seating that is not considered floor area and is not reflected in this table.</i></p> <p><i>Source: Eyestone Environmental, 2018.</i></p>		

would be clustered to provide open areas in the facade to reduce the visual massing of the proposed buildings and reflect the scale and variability of the surrounding neighborhood. The corners of the buildings along Pacific Avenue would be rounded in plan and set back to increase pedestrian and automobile visibility and provide increased public space along the sidewalk. The northwest corner of the West Building would feature community rooms and an observation deck at a height of 59 feet.

The building façades would be clad with stucco intermixed with fixed and operable windows on the upper levels, and glazed roll-up doors on the ground level. The ground-level retail and community arts/community meeting spaces would feature storefront glazing to provide maximum visibility and natural light. The internal parking structures would be constructed of concrete block and would be largely obscured from view.

### 3. Open Space and Landscaping

The Project would provide approximately 16,250 square feet of open space, which would exceed the open space requirements of 14,575 square feet as set forth by LAMC Section 12.21-G. As discussed in more detail below, open space provided would include outdoor common open space



**Figure A-5**  
Ground Floor Plan

Source: Eyestone Environmental, 2018.

areas along the banks of the Grand Canal, outdoor open space areas in the East Site of the Project Site, outdoor open space area on the roof deck of the West Building, and interior common open space area within the community room provided in the East Building.

The Project would be organized around and would enhance the Grand Canal. A minimum setback of 15 feet would be maintained to provide public open space along the eastern and western banks of the Grand Canal and would include terraced seating, landscaping, and plaza areas. Within the public right-of-way, the existing concrete sidewalks would remain, the existing pipe railings would be replaced, and the existing boat launch would be altered to be level with the sidewalk. The Project would also involve the removal of the approach slabs to the Short Line Bridge; however, the existing wing walls would remain. The existing vehicular bridge would be maintained and converted to a pedestrian bridge that would overlook the Grand Canal and connect the east and west portions of the Project Site. The converted pedestrian bridge would no longer be used for vehicular circulation.

The West Site would feature ground level pedestrian plazas along Pacific Avenue and the Grand Canal, interspersed with landscaping and street trees. The East Site would provide recessed northern and southern façades on the ground level to increase the width of landscaping and pedestrian seating along the sidewalk. The eastern banks of the Grand Canal would be framed by a hilly landscape of drought-tolerant grasses and plants. In addition, ground level artist live/work units would have roll-up doors that would allow for art display along an internal “Art Walk.”

An increased setback would also be provided adjacent to the neighboring properties at the northeast corner of the Project Site, thus providing a landscaped buffer between the existing residential buildings and the proposed Project buildings. This area would be accessed from Dell Avenue, and through three landscaped passages located along South Venice Boulevard.

Tree courtyards would be integrated throughout the Project to allow trees to grow through the buildings and provide landscape and natural light to the upper levels of the residential units. Additional open space would be provided in a community room located in the East Building, a shared roof deck provided on the West Building, and the observation deck located at the northwest corner of the Project Site.

As part of the Project, 11 street trees (including five dead street trees) and 24 non-protected significant trees on the Project Site would be removed to accommodate the development of the Project.<sup>7</sup> However, street trees would be replaced on a two-to-one basis within the Project Site, in the immediate vicinity, or to the satisfaction of the City of Los Angeles Department of Public Works, Bureau of Street Services, Urban Forestry Division. Tree species selected would be drought-tolerant and/or of a native tree species and would primarily require moist to dry soil conditions. Smart irrigation systems with flow sensors and drip tubing delivery systems would be used. In addition, non-protected significant trees on the Project Site would be removed and replaced at a 1:1 ratio, to the satisfaction of the City of Los Angeles Department of City Planning. The landscaping plans for the Project Site are illustrated in Figure A-4 on page A-8.

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<sup>7</sup> The Tree Resource, Tree Report, February 2018. See Appendix IS-1, of this Initial Study.

## 4. Access, Circulation, and Parking

Vehicular access to the new above-ground parking structures would be provided via driveways along both North Venice Boulevard and along South Venice Boulevard, as shown in further detail in Figure A-5 on page A-11. Each driveway would provide both ingress and egress. Deliveries are expected to be minimal for the small retail uses included in the Project. Delivery vehicles would have access to dedicated parking stalls for delivery vehicles in the parking structure located on the West Site of the Project Site. Access for trash pickup and other freight vehicles would be provided via the driveway on North Venice Boulevard for the trash room located in the East Site of the Project Site and from the driveway on South Venice Boulevard for the trash room located in the West Site of the Project Site.

Retail uses would be located along Pacific Avenue and the Grand Canal, with pedestrian access provided directly from the sidewalk. Residential uses would be located on the ground floor and second and third floors of the West Building. Upper floor residential units would be accessed through dedicated residential lobbies located on Pacific Avenue and North Venice Boulevard. Ground floor artist live/work residences would be accessed directly from the sidewalk. Pedestrian access to the parking structure on the West Site would be provided on Pacific Avenue, and access to the public parking structure on the East Site would be provided through a lobby on South Venice Boulevard. Access to the community arts/community meeting spaces would be provided by pedestrian pathways provided from both North Venice Boulevard and South Venice Boulevard.

Public transit service in the vicinity of the Project Site is currently provided by multiple local and regional bus lines. In particular, the Project Site is well-served by several nearby mass transit options, including the Los Angeles County Metropolitan Transportation Authority (Metro), Culver City Bus, and Santa Monica Big Blue Bus. Several bus stops within 0.5 miles of the Project Site fit the definition of a “major transit stop” in accordance with SB 743 (i.e., a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods). These include bus stops at Venice Way and Riviera Avenue, Abbot Kinney and Venice Boulevard, and Washington Boulevard and Pacific Avenue, among others.

The Project would provide up to 436 vehicular parking spaces. As discussed above, the 436 vehicular parking spaces would be provided in two parking structures, including a three-level parking structure with a partially below grade level on the West Site of the Project Site and a four-level above-grade parking structure with a partially below grade level on the East Site of the Project Site. These parking structures would reach a maximum height of 35 feet and would be wrapped by the proposed uses, which would serve to shield the parking structures. Parking for all residential uses on the Project Site as well as commercial uses would be provided on the West Site and would include up to 143 vehicular parking spaces. In addition, up to 293 vehicular parking spaces would be provided in a public parking structure on the East Site and would include the replacement parking for the existing surface parking spaces, as well as beach impact parking. The public parking structure would be managed by LADOT. As detailed further in Table A-2 on page A-14, of the parking spaces provided on the Project Site, 316 vehicular parking spaces are required based on the LAMC, which includes 188 replacement parking spaces for the existing surface parking lot to be removed under the Project. In addition, up to 120 vehicular parking spaces are non-required parking spaces that would be

**Table A-2  
Summary of Parking Provided on the Project Site**

Parking Type	Required	Provided
<b>West Site</b>		
Residential Parking <sup>a</sup>	61	61
Commercial Parking <sup>b</sup>	44	44
Additional (non-required) Parking	0	38
<i>West Site Subtotal</i>	<i>105</i>	<i>143</i>
<b>East Site</b>		
Beach Impact Parking <sup>b</sup>	23	23
Replacement Parking <sup>c</sup>	188	188
Additional (non-required) Parking	0	82
<i>East Site Subtotal</i>	<i>211</i>	<i>293</i>
<b>Total</b>	<b>316</b>	<b>436</b>
<hr/> <sup>a</sup> <i>Parking reduction per Assembly Bill 744.</i> <sup>b</sup> <i>Parking to code per Venice Specific Plan.</i> <sup>c</sup> <i>Parking required by the AHOS program.</i> <i>Source: Eyestone Environmental, 2018.</i>		

provided by the Project. The Project also would comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking area.

Based on LAMC requirements, the Project would provide 136 bicycle parking spaces (including 117 long-term and 19 short-term bicycle parking spaces). Bicycle racks would be distributed across the Project Site, with enclosed bicycle parking provided for residents as required by Section 12.21 A.16 of the LAMC.

## 5. Lighting and Signage

The Project would include low-level interior lighting visible through the windows of the residential units, residential supportive service spaces and amenities, and the ground-floor lobby; low-level accent lighting on the proposed building to highlight architectural features and signage; lighting associated with the outdoor decks and walkways on the second and third floors; low-level lighting on the roof deck at the top level of the northwest corner of the proposed buildings; and low-level security, wayfinding lighting and landscape lighting throughout the Project Site.

All exterior lighting would be shielded or directed toward the areas to be illuminated to limit light spillover onto off-site uses and would meet all applicable LAMC lighting standards. As required by Chapter 9, Article 3, Div. 1, Section 93.0117(b) of the LAMC, no exterior light sources and building materials associated with the Project would cause more than two foot-candles of lighting intensity or generate direct glare onto: (1) exterior glazed windows or glass doors on any property containing residential units; (2) an elevated habitable porch, deck, or balcony on any property containing

residential units; or (3) any ground surface intended for uses, such as recreation, barbecue or lawn areas, or any other property containing a residential unit or units. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be subject to the approval of the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

Project signage would include identity signage and directional/wayfinding signs. In general, new signage would be architecturally integrated into the design of the buildings and would establish appropriate identification for the residential uses. Project signage would be illuminated by means of low-level external lighting, internal halo lighting, or ambient light. Exterior lights would be directed onto signs to minimize offsite glare. The Project would not include electronic signage or signs with flashing, mechanical, or strobe lights. In accordance with Chapter 1, Article 4.4, Section 14.4.4-E of the LAMC, illumination used for project signage would be limited to a light intensity of three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

## 6. Site Security

The Project would implement numerous design features to reinforce on-site security. These proposed features include sufficient lighting throughout the Project Site to ensure safety and visibility. Entryways and parking areas would also be well illuminated and designed to eliminate areas of concealment. Other features include secure entry to the property, unit intercoms, and security cameras throughout the Project Site.

## 7. Sustainability Features

The Project would incorporate features to support and promote environmental sustainability. “Green” principles are incorporated throughout the Project to comply with the City of Los Angeles Green Building Code and the sustainability intent of the U.S. Green Building Council’s Leadership in Energy and Environmental Design (LEED®) green building standards. The Project proposes to achieve LEED certification by the U.S. Green Building Council. These include, but are not limited to, energy-efficient buildings, a pedestrian- and bicycle-friendly site design, and water conservation and waste reduction features. The Project would also utilize sustainable planning and building strategies and incorporate the use of environmentally-friendly materials, such as non-toxic paints and recycled finish materials, whenever feasible. The following specific features would be incorporated in the Project:

### Energy Conservation and Efficiency

- Use of Energy Star-labeled products and appliances, including dishwashers in the residential units, where appropriate.
- Use of full-cutoff or fully shielded on-street lighting oriented to pedestrian areas/sidewalks so as to minimize overlighting, light trespass, and glare.

- Use of light-emitting diode (LED) lighting or other energy-efficient lighting technologies, such as occupancy sensors or daylight harvesting and dimming controls, where appropriate, to reduce electricity use.
- Incorporation of passive energy efficiency strategies, such as façade shading, roof overhangs, internal tree courtyards; high-efficiency domestic heaters; and
- Use of natural ventilation, when conditions permit, to reduce energy use and carbon emissions, while improving occupant health and productivity.
- Use of insulated plumbing pipes and high-efficiency domestic water heaters.
- Use of refrigerants that reduce ozone depletion.
- Use of energy-efficient electrical and mechanical equipment and monitoring systems.
- Provision of conduit that is appropriate for future photovoltaic and solar thermal collectors.
- Training for property managers and maintenance staff in the use of a Green Operations and Maintenance Manual.

#### Water Conservation

- Inclusion of water conservation measures in accordance with Los Angeles Department of Water and Power requirements for new development in the City of Los Angeles (e.g., high-efficiency fixtures and appliances, weather-based irrigation systems, and drought-tolerant landscaping).
- Use of High Efficiency Toilets for residential units with a flush volume of 1.0 gallons of water per flush.
- Use of showerheads with a flow rate of 1.5 gallons per minute.
- Use of high-efficiency Energy Star–rated residential and commercial clothes washers.
- Use of high-efficiency Energy Star–rated residential dishwashers, should dishwashers be provided.
- Provide domestic Water Heating System located in close proximity to point(s) of use.
- Use of individual metering and billing for water use for every commercial unit.
- Use of Drip/Subsurface Irrigation (Micro-Irrigation).
- Use of proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together).
- Drought Tolerant Plants.

#### Water Quality

- Installation of catch basin inserts and screens to provide runoff contaminant removal.

- Preparation and implementation of a Stormwater Pollution and Prevention Plan and Standard Urban Stormwater Mitigation Plan, both of which would include Best Management Practices to control stormwater runoff and minimize pollutant loading and erosion effects during and after construction.

### Solid Waste

- Use of building materials with a minimum of 10 percent recycled-content for the construction of the Project.
- Implementation of a construction waste management plan to recycle and/or salvage a minimum of 70 percent of nonhazardous construction debris or minimize the generation of construction waste to 2.5 pounds per square foot of building floor area.
- Provision of an easily-accessible recycling area for tenant use that serves the entire building.

### Transportation

- Allocation of preferred parking for alternative-fuel vehicles, low-emitting, and fuel-efficient and ride-sharing vehicles.
- Provision of electric vehicle charging stations in accordance with City policy (e.g., five percent of the total required parking spaces).
- Provision of bicycle parking in accordance with City requirements (e.g. long- and short-term requirements for residential and commercial uses).

### Air Quality

- Employment of practices that prohibit the use of chlorofluorocarbons (CFCs) in HVAC systems.
- Meeting applicable California and/or Los Angeles air emissions requirements for all heating or cogeneration equipment utilized at the Project Site.
- Installation of landscaping throughout the Project Site to provide shading and capture carbon dioxide emissions.
- Use of adhesives, sealants, paints, finishes, carpet, and other materials that emit low quantities of volatile organic compounds (VOCs) and/or other air quality pollutants.

In accordance with CEQA Guidelines Appendix F, the EIR would provide further information as to energy conservation, energy implications, and the energy-consuming equipment and processes that would be used during Project construction and operation. Design features of the Project, energy supplies that would serve the Project, and total estimated daily vehicle trips that would be generated by the Project will also be analyzed. An analysis of the Project's consistency with Appendix F will be provided in the EIR.

## 8. Anticipated Construction Schedule

Project construction is anticipated to begin in 2020 and be completed 2023. The Project would be constructed in three phases:

- Phase 1A (West Site): Construction of mixed-use housing development, including 56 residential units, approximately 4,565 square feet of commercial uses, and a three-level parking structure with a partially below grade level providing 143 parking spaces for all residential uses on the Project Site as well as commercial uses.
- Phase 1B (East Site): Construction of a four-level public parking structure with a partially below grade level, providing up to 293 parking spaces.
- Phase 2: (East Site): Construction of three-story housing development, including 84 housing units and approximately 3,155 square feet of community arts/community meeting spaces.

Construction of the Project would commence with demolition of the surface parking areas and multi-family residential building. After demolition and site preparation, construction on Phases 1A and 1B would commence concurrently, beginning with grading and excavation for building foundations. Building foundations for Phases 1A and 1B would then be laid, followed by building construction, paving/concrete installation for both phases, and landscape installation for Phase 1A. After Phase 1B is completed, construction would commence on Phase 2, beginning with laying building foundations and followed by building construction, paving/concrete installation and landscape installation. It is anticipated that Phase 1A construction would be completed within 20 months and Phase 1B would be completed within 15 months. After Phase 1B is completed, construction on Phase 2 would commence and be completed within 18 months.

The estimated depth of excavation is anticipated to range from approximately five feet to 10 feet below grade when accounting for mat footings. It is estimated that approximately 3,600 cubic yards of export material (e.g., concrete and asphalt surfaces, and demolished multi-family residential building) and 5,500 cubic yards of soil would be hauled from the Project Site during the demolition and excavation phase.

It is anticipated that the primary haul routes to and from the Project Site would include use of Venice Boulevard to the I-450 Freeway or use of Venice Boulevard, to Lincoln Boulevard, to the I-10 Freeway to the north.

## D. Requested Permits and Approvals

The list below includes the anticipated requests for approval of the Project. The EIR will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to LAMC Section 11.5.6 and 11.5.11, General Plan Amendment to the Venice Community Plan to change the land use designation from Open Space to Neighborhood Commercial and an amendment to the Venice Community Plan text to delete the reference in Policy 5-1.1 and the statement on page III-15 regarding open space in the Venice Boulevard median;
- Pursuant to LAMC Sections 11.5.11., 11.5.11.(e), 12.32.F., and 12.32.Q, a Vesting Zone Change and Height District Change from OS-1XL-O to [T][Q]C2-1L-O using the following Developer Incentives:
  - Reduction of residential parking pursuant to AB 744;
  - Permit the required residential parking for the building on the East Site to be located in the building on the West Site; and,
  - Utilize the side and rear yard requirements for the RAS3 Zone.
- Pursuant to LAMC Section 11.5.7.G, Specific Plan Amendments to the Venice Coastal Specific Plan to:
  - Change the Existing Zoning Map (Exhibit 7b) from OS-1XL to [T][Q]C2-1L-O to be consistent with the proposed zone;
  - Amend Section 10.F.4.a to decrease the front yard setback from five feet to zero feet only on the portion of the Project comprising the cantilevered architectural campanile, which contains a community space, which would be located at the corner of North Venice Boulevard and Pacific Avenue and occurring at a height of 35 feet to 59 feet;
  - Amend Section 10.E.2 to increase the maximum height from 22 feet to 35 feet for the portion of the Project within 10 feet from the property line that faces the Canal and to not require an ascending height equal to one half the horizontal depth above 22 feet in height to a maximum height of 35 feet;
  - Amend Section 10.F.3.a to not require a 35-foot high Varied Roofline, which roofline varies in elevation from zero feet to 35 feet, and to not require that the roof be set back from the required front yard at least one foot in depth for every foot in height above 30 feet;
  - Amend Section 9.C.1.a to increase the maximum allowable height of Roof Access Structures from 10 feet to 15 feet above the Flat Roof height to accommodate the Project's elevator;
  - Amend Section 9.C.1.d to increase the allowable area within the outside walls of the Roof Access Structure from 100 feet to 300 feet for the stair and elevator; and,
  - Amend Section 9.C.1.f to decrease the horizontal set back of the Roof Access Structures from 60 horizontal feet to no less than 35 horizontal feet from the mean high tide line of the Grand Canal.
- Pursuant to Los Angeles Municipal Code Section 11.5.6. and Venice Coastal Zone Specific Plan, Section 8.B., a Project Permit Compliance in accordance with the Venice Coastal Zone Specific Plan.

- Amendments to the Venice Local Coastal Program Land Use Plan (LUP) (Exhibit 10b) to change the land use categorization from Open Space to Neighborhood; and to permit the consolidation of lots in the North Venice and Venice Canals Subareas (Policy 1.A.1.b.);
- Pursuant to LAMC Section 12.20.2., a Coastal Development Permit to demonstrate consistency with the Venice Local Coastal Program Land Use Plan;
- Pursuant to LAMC Section 12.37.I.3., a Waiver of Dedication and Improvements on North and South Venice Boulevard, Pacific Avenue and Dell Avenue;
- Pursuant to LAMC Section 16.05, Site Plan Review for the development of 50 or more net new residential dwelling units;
- Pursuant to LAMC Section 17.03 and 17.15, Division of Land (Vesting Tentative Tract Map No. 82288) for the merger and resubdivision of the Property, merging all of the existing lots and creating an airspace subdivision; and
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, haul route permits; grading permits, excavation permits, foundation permits, and building permits.

## **B. Explanation of Checklist Determinations**

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# INITIAL STUDY

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## Attachment B: Explanation of Checklist Determinations

### I. Aesthetics

Senate Bill (SB) 743 [Public Resources Code (PRC) Section 21099(d)] sets forth new guidelines for evaluating project impacts under CEQA, as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” PRC Section 21099 defines a “transit priority area” as an area within 0.5 miles of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21099 defines an “employment center project” as “a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an “infill site” as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that “visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA.”<sup>1</sup>

As shown in Figure A-3 in Attachment A, of this Initial Study, the Project Site is located within a TPA and, thus, PRC Section 21099 applies to the Project. Therefore, the Project’s aesthetic impacts would not be considered significant. However, an analysis of the Project’s potential effects regarding aesthetics would be included in the Draft EIR for informational purposes only and not for determining

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<sup>1</sup> City of Los Angeles Department of City Planning, Zoning Information File (ZI No. 2452), Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA.

whether the Project would result in significant impacts to the environment. Any aesthetic impact analysis in the Draft EIR is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this Initial Study shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

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

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

**No Impact.** A scenic vista is a view of a valued visual resource. Scenic vistas generally include public views that provide visual access to large panoramic views of natural features, unusual terrain, or unique urban or historic features. A scenic vista field of view can be wide, extend into the distance, and include focal views that focus on a particular object, scene, or feature of interest for the benefit of the general public. The Project Site is located within a highly urbanized area of the City of Los Angeles. Visual resources in the general vicinity of the Project Site include the Pacific Ocean to the east, the Santa Monica Mountains to the north, and the historic Venice Canals. As discussed in Attachment A, Project Description, of this Initial Study, the Project includes development of two low-rise buildings. These new buildings could potentially change the existing scenic vistas in the Project area. However, the Project is a mixed-use residential project that will be located on an infill site within a transit priority area. Accordingly, under Senate Bill (SB) 743, the aesthetic impacts of the Project shall not be considered a significant impact on the environment. Nevertheless, for informational purposes only, the EIR will analyze the Project’s potential effects on scenic vistas.

**b) Would the Project 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 state scenic highway?**

**No impact.** The Project Site is not located along a state scenic highway. The nearest officially designated state scenic highway is along the State Route 2 (SR-2), approximately 22.5 miles

northeast of the Project Site, and the nearest eligible state scenic highway is along the Pacific Coast Highway (SR-1), approximately 1.12 miles east of the Project Site.<sup>2</sup> In addition, the nearest City-designated scenic parkway is along SR-1 beginning at the Santa Monica City boundary, approximately 3.93 miles north of the Project Site.<sup>3</sup> Given the locations of the nearest eligible and designated scenic highways to the Project Site and the boundaries of the Project Site, the Project would not damage scenic resources, including trees, rock outcroppings, and historic buildings within an eligible or designated scenic highway. Therefore, the Project would have no impacts to scenic resources within a scenic highway.

As discussed above in Response to Checklist Question I.a, the Project Site is traversed by a segment of the Grand Canal, which is part of the Venice Canal system, an identified historic resource. Therefore, the EIR will provide further analysis of the Project's potential impact to the Venice Canal system as a potential visual resource.

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

**No Impact.** As discussed in Attachment A, Project Description, of this Initial Study, the Project Site is located in a highly urbanized area characterized by a mixture of low- and mid-rise buildings occupied by a mix of uses. While the proposed buildings are anticipated to be compatible with the existing visual character and quality of the surrounding area, the Project would change the visual character of the Project Site and its surroundings with the introduction of new buildings on a Project Site with surface parking predominately covering the Project Site. In addition, the new buildings would have the potential to shade sensitive land uses in the Project vicinity. While the Project could have the potential to degrade the existing visual character or quality of the Project Site and the surrounding area, the Project is a mixed-use residential project that would be located on an infill site within a transit priority area. Accordingly, under SB 743, aesthetic impacts of the Project shall not be considered a significant impact on the environment. Nevertheless, for informational purposes only, the EIR will analyze the Project's potential effects on visual character and quality.

**d) Would the Project create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?**

**No Impact.** The Project Site currently generates moderate levels of light and glare typical of an urban area. Light sources include lighting associated with the multi-family residential building, vehicle headlights, and parking lot lighting. Glare sources include glass and metal vehicle and building surfaces. The Project would introduce new sources of light and glare that are typically associated with residential uses, including low-level interior lighting visible through the windows of the residential units, affordable resident services and amenities, community arts/community meeting spaces, retail uses, and the ground-floor lobbies; low-level accent lighting on the proposed buildings to highlight architectural features and signage; and low-level security, wayfinding lighting and

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<sup>2</sup> California Scenic Highway Mapping System, Los Angeles County, [www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/index.htm](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm), accessed June 22, 2018.

<sup>3</sup> Mobility Plan 2035, Map A3, Citywide General Plan Circulation System—West Subarea.

landscape lighting throughout the Project Site. Furthermore, the Project would include new low to mid-rise buildings, which would introduce an increased amount of nighttime lighting as compared to existing conditions. However, the Project is a mixed-use residential project that will be located on an infill site within a transit priority area. Accordingly, under SB 743, aesthetic impacts of the Project shall not be considered a significant impact on the environment.<sup>4</sup> Nevertheless, for informational purposes only, the EIR will analyze how the Project's light and glare will affect the Project area.

## II. Agriculture and Forest Resources

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>4</sup> CEQA Guidelines Appendix G, which includes a comprehensive list of environmental topics under CEQA, does not expressly list shade and shadow impacts. The L.A. CEQA Thresholds Guide, however, considers shade and shadow impacts to be a type of aesthetic visual character impact under question 1c of Appendix G. The City has issued Zoning Information File (ZI) No. 2145, confirming that SB 743 applies to a project's aesthetic impacts, including shade and shadow impacts.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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.** The Project Site is located in an urbanized area of the City of Los Angeles. As discussed in Attachment A, Project Description, of this Initial Study, the Project Site is currently developed with a surface parking lot containing 188 vehicular parking spaces, and a two-story, 2,072-square-foot residential building containing four dwelling units and is traversed by a segment of the Grand Canal. In addition, the uses surrounding the Project Site include commercial and residential uses. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding area are also not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.<sup>5</sup> As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**b) Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?**

**No Impact.** The Project Site is zoned by the LAMC as OS-1XL-O (Open Space, Height District 1XL, Oil Drilling District), which permits parks and recreation facilities; natural resources preserves, marine and ecological preserves, sanctuaries and habitat protection sites; sanitary landfill sites; public water supply reservoirs, and water conservation areas. The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.<sup>6</sup> Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

<sup>5</sup> City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 24, 2018.

<sup>6</sup> California Department of Conservation, Los Angeles County Williamson Act FY 2015/2016, 2016.

**c) Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**

**No Impact.** As previously discussed, the Project Site is located in an urbanized area and is currently developed with a surface parking lot containing 188 vehicular parking spaces, and a two-story, 2,072-square-foot residential building containing four dwelling units and is traversed by a segment of the Grand Canal. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for open space uses. The Project Site is not zoned for forest land and is not used as forest land.<sup>7</sup> Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources Code. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** As previously discussed, the Project Site is located in an urbanized area and does not include any forest land or timberland. Therefore, the Project would not result in the loss or conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**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.** The Project Site is located in an urbanized area of the City of Los Angeles and does not include farmland. The Project Site and surrounding area are not mapped as farmland, are not zoned for farmland or agricultural use, and do not contain any agricultural uses.<sup>8</sup> As such, the Project would not result in the conversion of farmland to non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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<sup>7</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 24, 2018.

<sup>8</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 24, 2018.

### III. Air Quality

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) Would the Project conflict with or obstruct implementation of the Air Quality Plan?**

**Potentially Significant Impact.** The Project Site is located within the 6,700-square-mile South Coast Air Basin (the Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [PM<sub>2.5</sub>], and lead<sup>9</sup>). The SCAQMD’s 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.<sup>10</sup> With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities

<sup>9</sup> Partial Nonattainment designation for lead for the Los Angeles County portion of the Basin only.

<sup>10</sup> SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

Strategy (2016–2040 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG’s planning area.

Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse effect on the SCAQMD’s implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project’s potential air quality impacts and consistency with the SCAQMD’s AQMP.

**b) Would the Project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**

**Potentially Significant Impact.** The Project would result in increased air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Construction-related pollutants would be associated with sources such as construction worker vehicle trips, the operation of construction equipment, site grading and preparation activities, and the application of architectural coatings. During Project operation, air pollutants would be emitted on a daily basis from motor vehicle travel, natural gas consumption, and other on-site activities. Therefore, air quality standards could be violated and the EIR will provide further analysis of the Project’s construction and operational air pollutant emissions.

**c) Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?**

**Potentially Significant Impact.** As discussed above, construction and operation of the Project would result in the emission of air pollutants in the Basin, which is currently in non-attainment of federal air quality standards for ozone, PM<sub>2.5</sub> and lead, and State air quality standards for ozone, particulate matter less than 10 microns in size (PM<sub>10</sub>), and PM<sub>2.5</sub>. Therefore, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin. The EIR will provide further analysis of cumulative air pollutant emissions associated with the Project.

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

**Potentially Significant Impact.** As discussed above, the Project would result in increased short- and long-term air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sensitive receptors located in the vicinity of the Project Site include residential uses. Therefore, the Project could expose sensitive receptors to substantial pollutant concentrations and the EIR will provide further analysis of the Project’s potential to result in substantial adverse impacts to sensitive receptors.

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

**Less Than Significant Impact.** No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people.

With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses, as the Project would include residential live/work, office, restaurant, and retail uses. In addition, the proposed restaurant uses would comply with SCAQMD Rule 1138 regarding restaurant emissions. On-site trash receptacles would also be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts. Construction and operation of the Project would also comply with SCAQMD Rules 401 and 403 regarding visible emissions violations.<sup>11</sup>

Additionally, construction and operation of the Project would comply with SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.<sup>12</sup>

Based on the above, the potential odor impact during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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<sup>11</sup> SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, [www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust](http://www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust), accessed June 24, 2018.

<sup>12</sup> SCAQMD, Rule 402, Nuisance.

# IV. Biological Resources

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

**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 regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

**Potentially Significant Impact.** The Project Site is located in an urbanized area and is currently developed with a surface parking lot containing 188 vehicular parking spaces, and a two-story, 2,072-square-foot residential building containing four dwelling units and is traversed by a segment of the Grand Canal. Landscaping is limited, consisting of 24 ornamental trees located along

the public right-of-way.<sup>13</sup> Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. However, as a segment of the Grand Canal traverses the Project Site, it is possible that a special status species listed by the California Department of Fish and Wildlife<sup>14</sup> or by the U.S. Fish and Wildlife Service<sup>15</sup> could be present in the Project area. Therefore, the EIR will provide further analysis of the Project's potential to result in direct and indirect impacts to any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

**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 Game or U.S. Fish and Wildlife Service?**

**Potentially Significant Impact.** The Project Site is located in an urbanized area and is currently developed with a surface parking lot containing 188 vehicular parking spaces, and a two-story, 2,072-square-foot residential building containing four dwelling units and is traversed by a segment of the Grand Canal. As a segment of the Grand Canal traverses the Project Site, it is possible that a riparian habitat or other sensitive natural community could be present in the Project area. Therefore, the EIR will provide further analysis of the Project's potential to result in a substantial adverse effect on any riparian habitat or other sensitive natural community.

**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?**

**Potentially Significant Impact.** The Project Site is located in an urbanized area and is currently developed with a surface parking lot containing 188 vehicular parking spaces, and a two-story, 2,072-square-foot residential building containing four dwelling units. However, the Project Site is traversed by a segment of the Grand Canal. While the Grand Canal is channelized and the Project would not result in modification to the canal itself, the EIR will provide further analysis of the Project's potential to result in impacts to the Grand Canal.

**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?**

**Potentially Significant Impact.** As described above, the Project Site is currently developed with a surface parking lot containing 188 vehicular parking spaces, and a two-story, 2,072-square-foot

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<sup>13</sup> The Tree Resource, Tree Report, February 2018. See Appendix IS-1, of this Initial Study.

<sup>14</sup> California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, October 2017.

<sup>15</sup> United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, <https://ecos.fws.gov/ecp0/reports/species-listed-by-state-report?state=CA&status=listed>, accessed June 24, 2018.

residential building containing four dwelling units and is traversed by a segment of the Grand Canal. The Project Site currently contains limited to sparse landscaping. Furthermore, the areas surrounding the Project Site are fully developed, and there are no large expanses of open space areas within and surrounding the Project Site that provide linkages to natural open spaces areas and that may serve as wildlife corridors. However, as a segment of the Grand Canal traverses the Project it is possible that development of the Project could impede the movement of migratory fish. Therefore, the EIR will provide further analysis of the Project's potential to interfere 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) Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

**Potentially Significant Impact.** The Project Site is located in an urbanized area and is currently developed with a surface parking lot containing 188 vehicular parking spaces, and a two-story, 2,072-square-foot residential building containing four dwelling units and is traversed by a segment of the Grand Canal. Landscaping is limited, consisting of 24 ornamental trees located along the public right-of-way.<sup>16</sup> As a segment of the Grand Canal traverses the Project it is possible that development of the Project would impact protected biological resources. Therefore, the EIR will provide further analysis of the Project's potential to conflict with any local policies or ordinances protecting biological resources.

**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?**

**Potentially Significant Impact.** The Project Site is located in an urbanized area and is currently developed with a surface parking lot containing 188 vehicular parking spaces, and a two-story, 2,072-square-foot residential building containing four dwelling units and is traversed by a segment the Grand Canal. The Grand Canal, including the segment that bisects the Project Site, is designated as Environmentally Sensitive Habitat Area in the Venice Local Coastal Program Land Use Plan.<sup>17</sup> The Project would include open space along the banks of the Grand Canal. Therefore, the EIR will provide further analysis of the Project's potential to result in direct and indirect impacts to a habitat conservation plan.

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<sup>16</sup> The Tree Resource, Tree Report, February 2018. See Appendix IS-1, of this Initial Study.

<sup>17</sup> City of Los Angeles, Venice Local Coastal Program Land Use Plan, Exhibit22b, Environmentally Sensitive Habitat Areas, p. V-7.

# V. Cultural Resources

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

**a) Would the Project cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines §15064.5?**

**Potentially Significant Impact.** Section 15064.5 of the CEQA Guidelines generally defines a historic resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code). In addition, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register.

As discussed in Attachment A, Project Description, of this Initial Study, the Project Site is currently developed with a two-story residential building. This building was constructed in approximately 1965 and thus meets the National Register’s 50-year threshold for evaluating a potential historic resource.<sup>18</sup> Additionally, the Venice Canal system, a known historic resource, is

<sup>18</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 24, 2018.

located directly adjacent to and south of the Project Site.<sup>19</sup> Therefore, the EIR will provide further analysis of the Project's potential to result in direct and indirect impacts to historical resources.

**b) Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?**

**Potentially Significant Impact.** Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within a highly urbanized area and has been subject to grading and development in the past. Thus, surficial archaeological resources that may have existed at one time have likely been previously disturbed. Nevertheless, the Project would require grading, some soil movement and other construction activities that could have the potential to disturb previously undiscovered archaeological resources. Therefore, the EIR will provide further analysis of the Project's potential impacts to archaeological resources.

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

**Potentially Significant Impact.** The Project Site is located in an urbanized area and is currently developed with a surface parking lot containing 188 vehicular parking spaces, and a two-story, 2,072-square-foot residential building containing four dwelling units and is traversed by a segment of the Grand Canal. There are no unique geologic features on the Project Site. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Although the Project Site has been previously graded and developed, the Project would require some soil movement which would have the potential to disturb undiscovered paleontological resources that may exist within the Project Site. Therefore, the EIR will provide further analysis of the Project's potential impacts to paleontological resources.

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

**Potentially Significant Impact.** As discussed above, the Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. Nevertheless, as the Project would require some soil movement on the Project Site, the potential exists for the Project to uncover human remains. Therefore, the EIR will provide further analysis of this topic.

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<sup>19</sup> Historic Places LA, [www.historicplacesla.org/map](http://www.historicplacesla.org/map), accessed June 24, 2018.

## VI. Geology and Soils

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District* (CBIA v. BAAQMD), held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the project would have a significant impact related to geology and soils if it would result in any of the following impacts.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- |                                                                                                                                                                                                                                                                                                                                                                                           |                                     |                          |                                     |                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:                                                                                                                                                                                                                                                          |                                     |                          |                                     |                                     |
| i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?                                                                                                                                                                                                                                                      | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?                                                                                                                                                                                                                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?                                                                                                                                                                                                                                                                        | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b. Result in substantial soil erosion or the loss of topsoil?                                                                                                                                                                                                                                                                                                                             | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Be located on a geologic unit 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, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.**

**Potentially Significant Impact.** Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The California Geological Survey establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City of Los

Angeles designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

Based on City data, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, or within a City-designated Fault Rupture Study Area.<sup>20</sup> The closest active fault is the Santa Monica Fault located approximately 3.5 miles from the Project Site.<sup>21</sup> Nonetheless, as part of the EIR, a geotechnical report will be prepared to further address the potential for fault rupture impacts.

**ii) Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?**

**Potentially Significant Impact.** The Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. The closest active fault is the Santa Monica Fault located approximately 3.5 miles from the Project Site.<sup>22</sup> The Project would increase the amount of development on-site, thereby increasing the number of residents, employees, and visitors on-site. Therefore, additional people and structures would be exposed to potential adverse effects from ground shaking than under existing conditions. Although Project development must comply with the most current Los Angeles Building Code regulations, which specify structural requirements for different types of buildings in a seismically active area, further analysis of the potential for strong seismic ground shaking will be provided in the EIR.

**iii) Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?**

**Potentially Significant Impact.** Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their shear strength due to excess water pressure that builds up during repeated seismic shaking. A shallow groundwater table, the presence of loose to medium dense sand and silty sand, and a long duration and high acceleration of seismic shaking are factors that contribute to the potential for liquefaction. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials.

According to the State of California Seismic Hazard Zone Map for the Venice Quadrangle, and the City of Los Angeles General Plan, the Project Site is located in an area identified as having a potential for liquefaction.<sup>23,24</sup> Additionally, a review of the Los Angeles County Safety Element also

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<sup>20</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 24, 2018.

<sup>21</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 24, 2018.

<sup>22</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 24, 2018.

<sup>23</sup> State of California, California Geological Survey, Seismic Hazard Zones. Venice Quadrangle, 1999.

indicates that the site is located within an area identified as having a potential for liquefaction.<sup>25</sup> The Project Site is not located in an area susceptible to liquefaction as mapped by the City of Los Angeles. Nonetheless, as part of the EIR, a geotechnical report will be prepared to confirm this finding and ensure that potential impacts associated with liquefaction would be less than significant.

**iv) Landslides, caused in whole or in part by the project’s exacerbation of the existing environmental conditions?**

**No Impact.** Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and generally characterized by flat topography. In addition, the Project Site is not located in a landslide area as mapped by the State,<sup>26</sup> nor is the Project Site mapped as a landslide area by the City of Los Angeles.<sup>27,28</sup> Development of the Project would not substantially alter the existing topography of the Site. Specifically, the Project Site would remain flat and would not cause landslides. Therefore, the Project would not exacerbate existing conditions that would result in the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. As such, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** Development of the Project would require grading and excavation and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. Although Project development has the potential to result in the erosion of soils, this potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from the City’s Department of Building and Safety, which would include requirements and standards designed to limit potential impacts associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills. Regarding soil erosion during Project operations, the potential is relatively low since the Project Site would be fully developed and/or landscaped. Therefore, with compliance with applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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<sup>24</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 24, 2018.

<sup>25</sup> County of Los Angeles, General Plan, Safety Element, December 6, 1990.

<sup>26</sup> State of California, California Geological Survey, Seismic Hazard Zones. Venice Quadrangle, 1999.

<sup>27</sup> Los Angeles General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, p. 51.

<sup>28</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 24, 2018.

**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, caused in whole or in part by the project's exacerbation of the existing environmental conditions?**

**Potentially Significant Impact.** As discussed above, the Project Site is susceptible to ground shaking. Thus, lateral spreading, subsidence, and collapse will be addressed in the EIR. In addition, as discussed in Checklist Question No. VI(a)(iii), potential liquefaction impacts will also be addressed in the EIR. As discussed above in Response to Checklist Question No. VI(a)(iv) impacts associated with landslides would not occur as part of the Project.

**d) Would the Project 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 caused in whole or in part by the project's exacerbation of the existing environmental conditions?**

**Potentially Significant Impact.** Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The Project Site may contain soils that are considered to have a moderate expansion potential. Therefore, further analysis of this issue will be provided in the EIR.

**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.** The Project Site is located within a community served by existing sewage infrastructure. The Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

## VII. Greenhouse Gas Emissions

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** Gases that trap heat in the atmosphere are called greenhouse gases since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere affects the earth’s temperature. The State of California has undertaken initiatives designed to address the effects of greenhouse gas emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California. Activities associated with the Project, including construction and operational activities, could result in greenhouse gas emissions that may have a significant impact on the environment. Therefore, the EIR will provide further analysis of the Project’s greenhouse gas emissions.

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

**Potentially Significant Impact.** As the Project would have the potential to emit greenhouse gases, the EIR will include further evaluation of project-related emissions and associated emission reduction strategies to determine whether the Project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases (e.g., Assembly Bill [AB] 32 and the City of Los Angeles Green Building Code).

## VIII. Hazards and Hazardous Materials

As discussed above, in 2015, the California Supreme Court in *CBIA v. BAAQMD*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the Project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the Project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the Project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the Project. For example, if construction of the Project on a hazardous waste site will cause the potential dispersion of hazardous waste in the environment, the EIR should assess the impacts of that dispersion to the environment, including to the Project's residents. Thus, in accordance with Appendix G of the State CEQA Guidelines and the *CBIA v. BAAQMD* decision, the Project would have a significant impact related to hazards and hazardous materials if it would result in any of the following impacts.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including, where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands, caused in whole or in part from the project's exacerbation of existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**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.** The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of a mixed-use residential development, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed mixed-use residential uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. All potentially hazardous materials to be used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers' instructions and handled in accordance with all applicable standards and regulations, including but not limited to, those set forth by the federal and State Occupational Safety and Health Acts. Such requirements include obtaining material safety data sheets from chemical manufacturers, making these data sheets available to employees, labeling chemical containers in the workplace, developing and maintaining a written hazard communication program, and developing and implementing programs to train employees about hazardous materials. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

**b) Would the Project 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?**

**Potentially Significant Impact.** The on-site residential multi-family structure within the Project was constructed in approximately 1965, prior to the enactment of laws preventing the use of asbestos-containing materials, polychlorinated biphenyls, and lead based paint. Therefore, these hazardous materials may be present on the Project Site. In addition, the Project Site is located within a designated Methane Zone as mapped by the City. As such, further evaluation of this topic would be provided in the EIR.

**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.** There are no existing or proposed schools within a quarter of a mile of the Project Site. The nearest school is Westminster Avenue Elementary School, located approximately 0.43 miles northwest of the Project Site. All materials during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations including, but not limited to, federal and State Occupational Safety and Health Act requirements discussed above in Response to Checklist Question VIII.a. As such, the use of such materials would not create a significant hazard to nearby schools. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is 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, caused in whole or in part from the project's exacerbation of existing environmental conditions?**

**Potentially Significant Impact.** Section 65962.5 of the California Government Code requires the California Environmental Protection Agency to develop and update annually the Cortese List, which is a “list” of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a “list,” many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of multiple agencies. A detailed database search will be conducted as part of the EIR. As such, further analysis of this topic will be included in the EIR.

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

**No Impact.** While the Project Site is located approximately 1.80-mile northeast of the Santa Monica Airport, the Project Site is not located within an area subject to an airport land use plan.<sup>29</sup> Given the distance between the Project Site and Santa Monica Airport, the Project would not have the potential to result in a safety hazard. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is 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.** The Project Site is not located within the vicinity of a private airstrip. The nearest private airstrip is the Los Alamitos Army Airfield, located approximately 26.86 miles southeast of the Project Site. Given the distance between the Project Site and the Los Alamitos Army Airfield, the Project would not have the potential to result in a safety hazard. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**g) Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**Potentially Significant Impact.** According to the Safety Element of the City of Los Angeles General Plan, the nearest disaster route to the Project Site is Pacific Avenue, which is directly adjacent to the Project Site.<sup>30</sup> Construction and operation of the Project would generate vehicular traffic that would utilize this street. As such, potential impacts associated with emergency response will be further evaluated in the EIR.

**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, caused in whole or in part from the project’s exacerbation of existing environmental conditions?**

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<sup>29</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 24, 2018.

<sup>30</sup> Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.

**Less Than Significant Impact.** There are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone,<sup>31</sup> nor is it located within a City-designated fire buffer zone.<sup>32</sup> Therefore, the Project would not exacerbate conditions that would subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. Specifically, Section 57.106.5.2 of the LAMC provides that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; Section 57.118 of the LAMC establishes LAFD’s fire/life safety plan review and LAFD’s fire/life safety inspection for new construction projects; and Section 57.507.3.1 establishes fire water flow standards. Additionally, the proposed residential and retail uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

## IX. Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<sup>31</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 24, 2018. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older “Mountain Fire District” and “Buffer Zone” shown on Exhibit D of the Los Angeles General Plan Safety Element.

<sup>32</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**a) Would the Project violate any water quality standards or waste discharge requirements?**

**Potentially Significant Impact.** Construction activities associated with the Project would have the potential to result in the conveyance of pollutants into the adjacent Venice Canals and municipal storm drains, particularly during precipitation events. In addition, potential changes in on-site drainage patterns resulting from Project operation and the introduction of new land uses could affect the quality and quantity of storm water runoff. Given the Project Site's proximity to the Venice Canal, further analysis of this issue will be included in the EIR.

**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)?**

**Potentially Significant Impact.** It is anticipated that the Project would result in a similar amount of on-site impermeable areas compared to existing conditions due to the nature of the existing site as predominately impervious. Nevertheless, the potential exists for existing percolation of

rainwater and irrigation water into the water table to be diminished, which could affect groundwater recharge. Therefore, further analysis of this topic will be included in the EIR.

**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?**

**Potentially Significant Impact.** The Project Site is currently developed with a surface parking lot containing 188 vehicular parking spaces, and a two-story, 2,072-square-foot residential building containing four dwelling units and is traversed by a segment of the Grand Canal. The Project would involve the demolition of the existing uses, construction of new buildings, and the installation of new landscaped areas, which would have the potential to alter the existing drainage pattern of the Project Site. Therefore, further analysis of this issue will be included in the EIR.

**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?**

**Potentially Significant Impact.** See Response to Checklist Question IX.c, above.

**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?**

**Potentially Significant Impact.** See Response to Checklist Questions IX.a and IX.c, above.

**f) Would the Project otherwise substantially degrade water quality?**

**Potentially Significant Impact.** See Response to Checklist Question IX.a, above.

**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.** The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles.<sup>33,34</sup> Thus, the Project would not place housing within a 100-year flood hazard area. No impacts would occur, and no mitigation would be required. No further analysis of this topic in an EIR is required.

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<sup>33</sup> Federal Emergency Management Agency, Flood Insurance Rate Map, Panel Number 06037C1752F and 06037C1751F, effective September 26, 2008.

<sup>34</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit F, p. 57.

**h) Would the Project place within a 100-year flood hazard area structures which would impede or redirect flood flows?**

**No Impact.** As discussed above in Response to Checklist Question IX.g, the Project Site is not located within a designated 100-year flood plain area. Therefore, the Project would not place structures that would impede or redirect flood flows within a 100-year flood plain. No impacts would occur, and no mitigation measures would be required. No further evaluation of this topic in an EIR is 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.** As discussed above, the Project Site is not located within a designated 100-year flood plain. The Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a potential Inundation Area.<sup>35</sup> No further evaluation of this topic in an EIR is required.

**j) Inundation by seiche, tsunami, or mudflow?**

**Potentially Significant Impact.** A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement associated with large, shallow earthquakes. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity.

The Project Site is located less than a quarter of a mile east of the Pacific Ocean and the Safety Element of the General Plan does map the Project Site as being located within an area potentially affected by a tsunami.<sup>36</sup> While a segment of the Grand Canal traverses the Project Site, there are no major water-retaining structures that are located immediately up-gradient from the Project Site. Thus, inundation as a result of seiche is considered low. As discussed above, the Project Site and surrounding area are fully developed and generally characterized by flat topography. Given the fact that the Project Site is not mapped by either the State or the City as being located in an area prone to landslides, the potential for the Project Site to be inundated by mudflows is low.<sup>37</sup> However, as the Project Site is located within an area potentially affected by a tsunami, further analysis of this issue will be included in the EIR.

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<sup>35</sup> Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation & Tsunami Hazard Areas, p. 59.

<sup>36</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, p. 59.

<sup>37</sup> See Checklist Question VI.a.iv. on page B-15.

# X. Land Use and Planning

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

## a) Would the Project physically divide an established community?

**Less Than Significant Impact.** As discussed in Attachment A, Project Description, of this Initial Study, the Project Site is located in a highly urbanized area characterized by a mixture of low- and mid-rise buildings occupied by a mix of uses. The Project would replace surface parking areas and a low-rise multi-family residential building with a new infill mixed-use project. All proposed development would occur within the boundaries of the Project Site as it currently exists, and the Project does not propose a freeway or other large infrastructure that would physically divide a community. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is 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?

**Potentially Significant Impact.** As discussed in Attachment A, Project Description, of this Initial Study, the Project requires discretionary approvals, including, but not limited to, a General Plan Amendment, a Vesting Zone and Height District Change, utilization of two Developer Incentives, a Specific Plan Amendment, a Project Permit Compliance, amendments to the Venice Local Coastal Program Land Use Plan, a Coastal Development Permit to demonstrate consistency with the LUP, a Waiver of Dedication and Improvements, a Site Plan Review, and a Vesting Tentative Tract Map. The Project could potentially conflict with land use plans, policies or regulations that were adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the EIR will provide further analysis of the whether the Project conflicts with applicable land use plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect.

**c) Would the Project conflict with any applicable habitat conservation plan or natural community conservation plan?**

**Potentially Significant Impact.** The Project Site is located in an urbanized area and is currently developed with a surface parking lot containing 188 vehicular parking spaces, and a two-story, 2,072-square-foot residential building containing four dwelling units and is traversed by a segment of the Grand Canal. The Grand Canal, including the segment that bisects the Project Site, is designated as Environmentally Sensitive Habitat Area in the Venice Local Coastal Program Land Use Plan.<sup>38</sup> The Grand Canal would be open space along the banks of the canal under the Project. Therefore, the EIR will provide further analysis of the Project’s potential to result in direct and indirect impacts to a habitat conservation plan.

## XI. Mineral Resources

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

**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.** No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.<sup>39,40,41</sup>

<sup>38</sup> City of Los Angeles, Venice Local Coastal Program Land Use Plan, Exhibit22b, Environmentally Sensitive Habitat Areas, p. V-7.

<sup>39</sup> City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

<sup>40</sup> State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.

<sup>41</sup> City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

The Project Site is mapped as being located within a City-designated oil field or oil drilling area.<sup>42</sup> Based on a review of the California Division of Oil, Gas and Geothermal Resources Well Finder website, the Project Site is located within the limits of the Venice Beach abandoned oil field and several oil wells are located in the vicinity of the Project Site.<sup>43</sup> The nearest well to the site is the Chevron Well Number 1, a plugged oil and gas production well, located approximately 300 feet to the west-southwest. However, due to the voluntary nature of record reporting by the oil well drilling companies, wells may be improperly located or not shown on the location map. Undocumented wells could be encountered during construction. Any wells encountered would be properly abandoned in accordance with the current requirements of the California Division of Oil, Gas and Geothermal Resources. Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No significant impacts would occur, and no mitigation measures would be required. No further evaluation of this issue is 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.** No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.<sup>44,45,46</sup> As discussed above in Response to Checklist Question XI.a, while the Project Site is located within the limits of the Venice Beach abandoned oil field, no producing oil wells exist on the Project Site. Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

## XII. Noise

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project result in:

- a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

<sup>42</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit E, p. 55.  
<sup>43</sup> California Department of Conservation, Division of Oil, Gas and Geothermal Resources, 2018, Well Finder, <https://maps.conservation.ca.gov/doggr/wellfinder/#close>, accessed June 29, 2018.  
<sup>44</sup> City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.  
<sup>45</sup> State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.  
<sup>46</sup> City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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?**

**Potentially Significant Impact.** During construction activities associated with the Project, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. In addition, because the Project would introduce new permanent residential and commercial uses to the Project Site, noise levels from on-site sources may also increase during operation of the Project. Furthermore, traffic attributable to the Project has the potential to increase noise levels along adjacent roadways. Therefore, further evaluation of this topic will be provided in the EIR.

**b) Would the Project result in exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?**

**Potentially Significant Impact.** Construction of the Project could generate groundborne noise and vibration associated with demolition, site grading, other clearing activities, the installation of building footings, and construction truck travel. As such, the Project would have the potential to generate and expose people to excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further evaluation of this topic will be provided in the EIR.

**c) Would the Project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

**Potentially Significant Impact.** As discussed in Response to Checklist Question XII.a., traffic and human activity associated with the Project, as described above, have the potential to increase ambient noise levels above existing levels. Therefore, further evaluation of this topic will be provided in the EIR.

**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?**

**Potentially Significant Impact.** As discussed above in Response to Checklist Questions XII.a and XII.b, construction activities associated with the Project would have the potential to temporarily or periodically increase ambient noise levels above existing levels. Therefore, further evaluation of this topic will be provided in the EIR.

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

**No Impact.** While the Project Site is located approximately 1.80-mile northeast of the Santa Monica Airport, the Project Site is not located within an area subject to an airport land use plan.<sup>47</sup> Given the distance between the Project Site and Santa Monica Airport, the Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**f) For a project located 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.** The Project Site is not located within the vicinity of a private airstrip. The nearest private airstrip is the Los Alamitos Army Airfield, located approximately 26.86 miles southeast of the Project Site. Given the distance between the Project Site and the Los Alamitos Army Airfield, the Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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<sup>47</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 24, 2018.

# XIII. Population and Housing

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

**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.** As discussed in Attachment A, Project Description, of this Initial Study, the Project would result in the construction of 34 live/work (artist loft) units, 51 studio units, 32 1-bedroom units, and 23 2-bedroom units for a total of 140 residential units. As such, the Project would increase the residential population within the Project vicinity. As discussed above in Checklist Question III.a, Air Quality, SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties and addresses regional issues relating to transportation, the economy, community development, and the environment. With regard to future growth, SCAG has prepared the 2016–2040 RTP/SCS, which provides population, housing, and employment projections for cities under its jurisdiction through 2040. The growth projections in the 2016–2040 RTP/SCS reflect the 2010 Census, employment data from the California Employment Development Department (EDD), population and household data from the California Department of Finance (DOF), and extensive input from local jurisdictions in SCAG’s planning area. The Project Site is located in SCAG’s City of Los Angeles Subregion. According to SCAG’s 2016–2040 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2018 is approximately 4,009,193 persons.<sup>48</sup> In 2023, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,145,604 persons.<sup>49</sup> Therefore, the projected population growth between 2018 and 2023 is approximately 136,411 persons. The estimated

<sup>48</sup> Based on a linear interpolation of 2012–2040 data.

<sup>49</sup> Based on a linear interpolation of 2012–2040 data.

household size for the City of Los Angeles is 2.43 persons per unit.<sup>50</sup> Applying this factor, development of 140 residential units would result in an increase of approximately 340 new residents.<sup>51</sup> The Project would remove four existing residential units on the Project Site.<sup>52</sup> Therefore, the Project would result in a net residential population of 330.<sup>53</sup> The estimated 330 net residents generated by the Project would represent approximately 0.24 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2018 and 2023. Furthermore, the Project does not include the extension of roads or other infrastructure that would indirectly induce substantial population growth in the area. Therefore, the Project's residents would be well within SCAG's population projection for the City of Los Angeles Subregion.

According to the 2016–2040 RTP/SCS, the forecasted number of households for the City of Los Angeles Subregion in 2018 is approximately 1,403,671 households.<sup>54</sup> In 2023, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,468,814 households.<sup>55</sup> Therefore, the projected household growth in the City between 2018 and 2023 is approximately 65,143 households. The Project would add a total of 140 residential units, but would remove four existing residential units on the Project Site. Thus, the Project's net total of 136 residential dwelling units would constitute up to approximately 0.21 percent of the housing growth forecasted between 2018 and 2023. Therefore, the Project's housing units would be well within SCAG's housing projection for the Los Angeles Subregion.

The Project would generate approximately 34 new employees based on employee generation rates provided by the Applicant for the office uses and developed by the Los Angeles Unified School District (LAUSD) for the retail and art space uses.<sup>56</sup> According to the 2016–2040 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2018 is approximately 1,797,693 employees.<sup>57</sup> In 2023, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,882,104 employees.<sup>58</sup> Therefore, the projected employment growth in the City between 2018 and 2023 is approximately 84,411 employees. Thus, the Project's estimated 34 new employees would constitute approximately 0.04 percent of the employment growth forecasted between 2018 and 2023. Therefore, the Project would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities.

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<sup>50</sup> Per correspondence with Jack Tsao from the Los Angeles Department of City Planning on March 8, 2018, based on the 2016 American Community Survey 5-year average estimate (2012–2016), the rate of persons per household for multiple-family units is 2.43 persons per unit.

<sup>51</sup> 140 residential units X 2.43 persons per unit = 340 persons.

<sup>52</sup> 4 residential units X 2.43 persons per unit = 10 persons.

<sup>53</sup> 340 new persons – 10 existing persons to be removed = 330 net population.

<sup>54</sup> Based on a linear interpolation of 2012–2040 data. SCAG forecasts “households,” not housing units. As defined by the U. S. Census Bureau, “households” are equivalent to occupied housing units.

<sup>55</sup> Based on a linear interpolation of 2012–2040 data.

<sup>56</sup> Los Angeles Unified School District, 2012 Developer Fee Justification Study, March 2017, Table 14.

<sup>57</sup> Based on a linear interpolation of 2012–2040 data.

<sup>58</sup> Based on a linear interpolation of 2012–2040 data.

As analyzed above, the net new population and housing that would be generated by the Project would be within SCAG's population and housing projections for the City of Los Angeles Subregion. Therefore, the Project would not induce substantial population or housing growth. Impacts related to population and housing would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required. With regard to cumulative population and housing impacts, please see Checklist Question XIX.b, below.

**b) Would the Project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?**

**c) Would the Project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?**

**Less Than Significant Impact b. and c.** The Project would result in the removal of four residential units. However, the Project would provide for 140 new residential units. Thus, a net total of 136 residential units would be provided on-site upon Project completion. As such, the Project would not displace substantial numbers of existing housing units or people that would require the construction or replacement of housing elsewhere. Impacts would be less than significant and no mitigation measures are required. No further analysis of this topic in the EIR is required.

## XIV. Public Services

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*

**a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?**

**Potentially Significant Impact.** The LAFD provides fire protection and emergency medical services for the Project Site. The Project would increase the building square footage on-site and increase the residential population, which could result in the need for new or physically altered LAFD facilities, the construction of which could cause significant environmental impacts. Therefore, further analysis of this issue will be included in the EIR.

**b) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?**

**Potentially Significant Impact.** Police protection for the Project Site is provided by the City of Los Angeles Police Department. The Project would include the development of additional residential and commercial uses on the site that would increase the density at the Project Site, and increase the residential and daytime population in the service area. This could result in the need for additional police services and associated facilities, the construction of which could cause significant environmental impacts. Therefore, the EIR will provide further analysis of this issue.

**c) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?**

**Potentially Significant Impact.** The Project Site is located within the boundaries of the LAUSD. The Project would include the development of additional residential uses, which would generate a demand for educational services and school facilities, the construction of which could cause significant environmental impacts. Therefore, the EIR will provide further analysis of this issue.

**d) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?**

**Potentially Significant Impact.** The development of additional residential uses as part of the Project would increase the number of residents at the Project Site that could utilize nearby parks and/or recreational facilities, possibly necessitating new parks, the construction of which could cause significant environmental impacts. Thus, the EIR will provide further analysis of this issue.

e) **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?**

**Potentially Significant Impact.** The development of additional residential uses as part of the Project would generate a new population that would generate a demand for library services provided by the Los Angeles Public Library, possibly necessitating the construction of new libraries which could cause significant environmental impacts. Therefore, the EIR will provide further analysis of this issue.

## XV. Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?**

**Potentially Significant Impact.** The development of additional residential uses as part of the Project would increase the number of residents at the Project Site that could utilize City parks and/or recreational facilities, possibly resulting in the physical deterioration of those facilities. Thus, the EIR will provide further analysis of this issue.

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.** The Project would not include the development of public recreational facilities. However, the Project would increase the number of residents at the Project Site that could utilize nearby recreational facilities, possibly necessitating the construction or expansion of new recreational facilities, which might have an adverse physical effect on the environment. Therefore, the EIR will provide further analysis of this topic.

Additionally, the Project would include development of private open space and recreational amenities associated with its residential component. The potential impacts associated with construction of these facilities are analyzed throughout this Initial Study, and will be further analyzed in the EIR for those topics where impacts could be potentially significant.

## XVI. Transportation/Traffic

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

**a) Would the Project 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?**

**Potentially Significant Impact.** The Project proposes development that would result in an increase in daily and peak-hour traffic in the vicinity of the Project Site. In addition, construction of the Project has the potential to affect the transportation system through the hauling of materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. Once construction is completed, the Project's residents, employees, and visitors would generate vehicle and transit trips throughout the day. The resulting increase in the use of the area's transportation facilities could 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. Therefore, further analysis of this issue will be provided in the EIR.

**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?**

**Potentially Significant Impact.** Metro administers the Congestion Management Program (CMP), a State-mandated program designed to address the impacts urban congestion has on local communities and the region as a whole. The CMP provides an analytical basis for the transportation decisions contained in the State Transportation Improvement Project. The CMP for Los Angeles County requires an analysis of any Project that could add 50 or more trips to any CMP intersection or more than 150 trips to a CMP mainline freeway location in either direction during either the A.M. or P.M. weekday peak hours. Implementation of the Project has the potential to generate additional vehicle trips, which could potentially add more than 50 trips to a CMP roadway intersection or more than 150 trips to a CMP freeway segment. Therefore, further analysis of this issue will be provided in the EIR.

**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?**

**Less Than Significant Impact.** The Project proposes a new building with a maximum height of 59 feet. Thus, proposed development would not be subject to FAA requirements that may apply to new buildings taller than 200 feet (e.g., completion of Form 7460-1 Notice of Proposed Construction or Alteration). In addition, while the Project Site is located approximately 1.80-mile northeast of the Santa Monica Airport, the Project Site is not located within the planning boundary of any airport land use plan. Impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is 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)?**

**No Impact.** The Project's design does not include hazardous design features. The roadways adjacent to the Project Site are part of the existing urban roadway network and contain no sharp curves or dangerous intersections due to design features. In addition, the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to

the Project Site. Furthermore, the design and implementation of new driveways would comply with the City’s applicable requirements, including emergency access requirements set forth by the LAFD. The Project design would also be reviewed by LADBS and the LAFD during the City’s plan review process to ensure all applicable requirements are met. Moreover, the Project would not introduce incompatible uses such as farm equipment to the Project Site. Therefore, no impacts associated with hazardous design features or incompatible uses would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**e) Would the Project result in inadequate emergency access?**

**Potentially Significant Impact.** While it is expected that construction activities for the Project would primarily occur within the Project Site, construction activities could potentially require the partial closure of travel lanes on adjacent streets for the installation or upgrading of local infrastructure. Construction within these roadways has the potential to impede access to adjoining uses, as well as reduce the rate of flow of the affected roadway. The Project would also generate construction traffic, particularly haul trucks, which may affect the capacity of adjacent streets and highways. Therefore, further analysis of this issue in the EIR is required.

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

**Potentially Significant Impact.** The Project Site is well-served by several nearby mass transit options, including Metro, Culver City Bus, and Santa Monica Big Blue Bus. The development of the Project could also increase demand for alternative transportation modes in the vicinity of the Project Site. Therefore, further analysis of the potential for the Project to conflict with adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities will be provided in the EIR.

## XVII. Tribal Cultural Resources

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- a. 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:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**a) 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:**

- i) 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)?**
- ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

**Potentially Significant Impact.** Approved by Governor Jerry Brown on September 25, 2014, AB 52 establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As noted above, the Project would require some soil movement. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or

object with cultural value to a California Native American Tribe. In compliance with AB 52, the City will notify all applicable tribes, and the City will participate in any requested consultations for the Project. Further analysis of this topic will be provided in the EIR.

## XVIII. Utilities and Service Systems

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

### a) Would the Project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

**Potentially Significant Impact.** The City of Los Angeles Department of Public Works provides wastewater collection and treatment services for the Project Site. As is the case under existing conditions, wastewater generated during operation of the Project would be collected and discharged into existing sewer mains and conveyed to the Hyperion Water Reclamation Plant in El Segundo. The Project would result in increased wastewater generation from the Project Site. Therefore, further analysis of this topic in the EIR will be provided.

**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?**

**Potentially Significant Impact.** The Project would result in increased wastewater generation and increased water demand. As such, the Project would result in increased use of water and wastewater infrastructure and facilities, possibly necessitating the construction of new facilities. Therefore, further analysis of this topic in an EIR will be provided.

**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?**

**Potentially Significant Impact.** See Response to Checklist Question IX.c, above. As discussed therein, the Project would involve the demolition of the existing uses, construction of new buildings, and the installation of new landscaped areas, which would have the potential to alter the existing drainage pattern of the Project Site and affect the amount of stormwater runoff. Therefore, further analysis of this issue will be included in the EIR.

**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?**

**Potentially Significant Impact.** LADWP supplies water to the Project Site. Given the Project's increase in the amount of developed floor area on the Project Site, the Project has the potential to result in an increased demand for water provided by LADWP. Therefore, further analysis of this issue will be provided in the EIR.

**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?**

**Potentially Significant Impact.** See Response to Checklist Question XVIII.b, above.

**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.** While the Bureau of Sanitation generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County are categorized as either Class III or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste,

yard trimmings, and earth-like waste are disposed of in inert waste landfills.<sup>59</sup> Ten Class III landfills and one inert waste landfill with solid waste facility permits are currently operating within the County.<sup>60</sup> In addition, there are two solid waste transformation facilities within Los Angeles County that convert, combust, or otherwise process solid waste for the purpose of energy recovery.

In 2017, the City of Los Angeles disposed of approximately 1.8 million tons of solid waste at the County's Class III landfills and approximately 17,405 tons at transformation facilities.<sup>61,62</sup> The 1.8 million tons of solid waste accounts for approximately 1.9 percent of the total remaining capacity (96.45 million tons) for the County's Class III landfills open to the City.<sup>63,64</sup>

The unclassified landfill serving the County is Azusa Land Reclamation. This facility currently has 57.56 million tons of remaining capacity and an average daily disposal rate of 846 tons per day.<sup>65</sup>

Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the Los Angeles County Countywide Integrated Waste Management Plan (CoIWMP) Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.<sup>66</sup> Based on the most recent 2015 CoIWMP Annual Report, the remaining total disposal capacity for the County's Class III landfills is estimated at 114.37 million tons.<sup>67</sup>

Based on the 2016 CoIWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2031 will not exceed the 2016 remaining permitted Class III landfill capacity of 103 million tons. The County, therefore, has disposal capacity beyond the Project's buildout year of 2023. Nonetheless, while there is no expected daily landfill capacity shortfall during

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<sup>59</sup> Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

<sup>60</sup> County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017. The 10 Class III landfills within the County include the Antelope Valley Landfill, the Burbank Landfill, the Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, San Clemente Landfill, Savage Canyon Landfill, the Scholl Canyon Landfill, and the Sunshine Canyon City and County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

<sup>61</sup> These numbers represent waste disposal, not generation, and thus do not reflect the amount of solid waste that was diverted via source reduction and recycling programs within the City.

<sup>62</sup> County of Los Angeles, Department of Public Works, Solid Waste Information System, Detailed Solid Waste Disposal Activity Report By Jurisdictions by Los Angeles (Reporting Period: January 2017 to December 2017).

<sup>63</sup>  $(1.8 \text{ million tons} \div 96.45 \text{ million tons}) \times 100 = 1.9 \text{ percent}$ .

<sup>64</sup> County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2016 Annual Report, December 2016, Appendix E-2 Table 1.

<sup>65</sup> County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2016 Annual Report, December 2016.

<sup>66</sup> County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2016 Annual Report, December 2016.

<sup>67</sup> This total excludes the estimated remaining capacity at the Puente Hills Landfill, which closed on October 31, 2013.

the planning period, there are constraints that may limit the accessibility of Class III landfill capacity. These constraints include washed boundaries, geographic barriers, weather, and natural disasters. Therefore, the 2016 CoWMP Annual Report evaluated seven scenarios to increase capacity and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with six of the seven scenarios. The 2016 CoWMP Annual Report also concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail. The City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.<sup>68</sup> The City of Los Angeles is currently diverting 76 percent of its waste from landfills.<sup>69</sup> The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030.

The following analysis quantifies the Project's construction and operation solid waste generation.

### **Construction**

The Project Site is currently developed with a 2,072-square-foot residential building and surface parking containing 188 vehicular parking spaces. Pursuant to the requirements of Senate Bill 1374,<sup>70</sup> the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. As shown in Table B-1 on page B-46, after accounting for mandatory recycling, the Project would result in approximately 1,811 tons of construction and demolition waste. Given the remaining permitted capacity the Azusa Land Reclamation facility, which is approximately 57.56 million tons, as well as the remaining 96.45 million tons of capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

### **Operation**

As shown in Table B-2 on page B-47, upon full buildout, the Project would generate approximately 349 tons of solid waste per year when accounting for the removal of the existing land

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<sup>68</sup> City of Los Angeles, Solid Waste Integrated Resource Plan FAQ.

<sup>69</sup> LA Sanitation, Recycling, [www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?\\_adf.ctrl-state=alxbkb91s\\_4&\\_afLoop=18850686489149411#!](http://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afLoop=18850686489149411#!), accessed June 29, 2018.

<sup>70</sup> Senate Bill 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.

**Table B-1  
Project Demolition and Construction Waste Generation**

Building	Size	Generation Rate (lbs/sf) <sup>a</sup>	Total (tons) <sup>b</sup>
<b>Construction Waste</b>			
Residential (140 du)	64,410 sf	4.38	141
Office	685 sf	3.89	1
Retail/Restaurant	4,565 sf	3.89	9
Community Arts/Community Meeting Spaces	3,155 sf	3.89	6
Common Area and Exterior Walkways	32,995 sf	3.89	64
Parking Structures	158,000 sf	3.89	307
<i>Construction Waste Subtotal</i>			529
<b>Demolition Waste</b>			
Residential Building Removed	2,072 sf	115	119
Surface Parking Removed	85,086 sf	155	6,594
<i>Demolition Waste Subtotal</i>			6,713
<b>Total for Construction and Demolition Waste</b>			<b>7,242</b>
<b>Total After 75-Percent Recycling</b>			<b>1,811</b>
<hr/> <i>du = dwelling unit</i> <i>lb = pound</i> <i>sf = square feet</i> <sup>a</sup> U.S. Environmental Protection Agency, Report No. EPA530-98-010, <i>Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 3, Table 4 and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.</i> <sup>b</sup> Numbers have been rounded. Source: Eyestone Environmental, 2018.			

uses. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with AB 341, which requires California commercial enterprises and public entities that generate four cubic yards of waste or more per week, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste LA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.<sup>71</sup> The estimated annual net increase in solid waste that would be generated by the Project represents approximately 0.0196 percent of the City's annual solid waste disposal<sup>72</sup> and approximately 0.000446 percent of the remaining capacity for the

<sup>71</sup> The Zero Waste LA Franchise System would divide the City into 11 zones and designate a single trash hauler for each zone. Source: LA Sanitation, Final Program Environmental Impact Report for City Ordinance: City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling (SCH# 2013021052), March 2014.

<sup>72</sup> 351 tons per year/1.79 million tons per year = 0.0196%

**Table B-2  
Estimated Project Solid Waste Generation**

<b>Building</b>	<b>Size</b>	<b>Employee Generation Rate per sf<sup>a</sup></b>	<b>Estimated No. of Employees</b>	<b>Solid Waste Generation Rate<sup>b,c</sup></b>	<b>Total Generation (tons/year)<sup>c</sup></b>
<b>Existing</b>					
Residential (4 du)	4 du	N/A	N/A	2.23/du/yr	9
<b>Total Existing</b>					<b>9</b>
<b>Proposed</b>					
Residential (140 du)	140 du	N/A	N/A	2.23/du/yr	312
Office	685 sf	N/A	12 <sup>d</sup>	0.37 tons/emp/yr	4
Retail/Restaurant	4,565 sf	0.00271	13	2.98 tons/emp/yr <sup>e</sup>	37
Community Arts/Community Meeting Spaces	3,155 sf	0.00271	9	0.73 tons/emp/yr	6
<b>Total Proposed</b>					<b>360</b>
<b>Total Net Increase (Proposed minus Existing)<sup>f</sup></b>					<b>351</b>
<hr/> <p><i>du = dwelling unit</i>  <i>emp = employee</i>  <i>lb = pound</i>  <i>sf = square feet</i></p> <p><sup>a</sup> <i>Employee Generation Rates from Los Angeles Unified School District Developer Fee Justification Study, March 2017, Table 14.</i></p> <p><sup>b</sup> <i>Non-residential yearly solid waste generation factors from City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, Table 4, July 2002. Assumes rate of 0.37 ton per employee (Services—Business) for Office uses, 2.98 tons per employee per year (Retail—Restaurants) for Retail/Restaurant uses, and 0.73 tons per employee (Services—Other) for Art Space uses.</i></p> <p><sup>c</sup> <i>Residential solid waste generation factor based on a rate of 12.23 pounds per household per day (or 2.23 tons per household per year), pursuant to the L.A. City CEQA Thresholds Guide.</i></p> <p><sup>d</sup> <i>Based on estimate Applicant's employment estimate.</i></p> <p><sup>e</sup> <i>Applies the higher generation rate for restaurant use in order to provide a conservative analysis.</i></p> <p><sup>f</sup> <i>The solid waste generated by the existing uses is subtracted from the solid waste generated by the proposed and the existing to remain, which results the net increase of solid waste that would be generated on the Project Site after completion.</i></p> <p><i>Source: Eyestone Environmental, 2018.</i></p>					

County's Class III landfills open to the City of Los Angeles.<sup>73</sup> The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of the County's Class III landfills.

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the construction and operation

<sup>73</sup> 351 tons per year/96.45 million tons = 0.000446%

of the Project. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**g) Would the Project comply with federal, state, and local statutes and regulations related to solid waste?**

**Less Than Significant Impact.** Solid waste management in the state is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce GHG emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in “zero waste” by 2030. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas on the ground floor in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171687), which requires that development projects include an on-site recycling area or room of specified size.<sup>74</sup> The Project would also comply with AB 939, AB 341, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, state, and local statutes and regulations related to solid waste, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

## XIX. Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Does the project:				
a. Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community,	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<sup>74</sup> Ordinance No. 171687, adopted by the Los Angeles City Council on August 6, 1997.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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. Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?                                                                                                                                                                                                    | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**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?**

**Potentially Significant Impact.** As discussed above, as a segment of the Grand Canal traverses the Project Site, the Project does have a potential to result in impacts to biological resources. In addition, the Project also has the potential to result in impacts to cultural resources as the Venice Canal system, a known historic resource, is located directly adjacent to and south of the Project Site. Therefore, further evaluation of this topic in an EIR is required.

**b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

**Potentially Significant Impact.** The potential for cumulative impacts occurs when the impacts of the Project are combined with impacts from related development projects and result in impacts that are greater than the impacts of the Project alone. Located in the vicinity of the Project Site are other current and reasonably foreseeable projects, the development of which, in conjunction with that of the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: aesthetics; air quality; cultural resources; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; public services (fire protection, police protection, schools, parks, and other public services); recreation; transportation/circulation; tribal cultural resources; and utilities (water, wastewater, and energy).

With respect to agricultural resources and mineral resources, the Project Site is located in an urbanized area, and would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts.

With regard to population and housing, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. As discussed in the analysis above, the estimated net population, employment, and housing generated by the Project would represent approximately 0.24 percent of the population growth, 0.21 percent of the housing growth, and 0.04 percent of the employment growth forecasted by SCAG for the City of Los Angeles Subregion between 2018 and 2023. Thus, these increases would be well within SCAG growth forecasts.

With regard to solid waste, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. As discussed above in Response to Checklist Question VIII.f, the estimated annual net increase in solid waste that would be generated by the Project represents approximately 0.0196 percent of the City's annual solid waste disposal and approximately 0.000446 percent of the remaining capacity for the County's Class III landfills open to the City of Los Angeles. As also previously discussed in Response to Checklist Question VIII.f, the demand for landfill capacity is continually evaluated by the County through preparation of the CoIWMP annual reports. Each annual CoIWMP report assesses future landfill disposal needs over a 15 year planning horizon. Based on the 2016 CoIWMP Annual Report, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e., 2031), which is beyond the Project's buildout year (2023). The preparation of each annual CoIWMP provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Furthermore, in future years, it is anticipated that the rate of declining landfill capacity would slow considering the City's goal to achieve zero waste by 2030.

Therefore, cumulative impacts with respect to these topics would be less than significant, and no mitigation measures are required. No further evaluation of these topics in an EIR is required.

**c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

**Potentially Significant Impact.** Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: aesthetics; air quality; cultural resources; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; public services (fire protection, police protection, schools, parks, and other public services); recreation; transportation/circulation; tribal cultural resources; and utilities (water, wastewater, and energy). As a result, these potential effects will be analyzed further in the EIR.