

5 SUSTAINABLE COMMUNITIES ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Except as provided in Public Resources Code Section 21099 would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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. In non-urbanized areas, substantially degrade the existing visual character or quality of public views the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | <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 checked="" type="checkbox"/> | <input type="checkbox"/> |

In 2013, the State of California enacted Senate Bill 743 (SB 743), which made several changes to the California Environmental Quality Action (CEQA) for projects located in areas served by transit. Specifically, Public Resources Code (PRC) Section 21099 provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” PRC Section 21099 defines a “transit priority area” as an area within one-half mile 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 or applicable regional transportation plan.” PRC Section 21064.3 defines “major transit stop” as the following:

- (a) An existing rail or bus rapid transit station.
- (b) A ferry terminal served by either a bus or rail transit service.
- (c) 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 21155 (b) states that a “major transit stop” is defined in PRC Section 21064.3, except that, for purposes of Section 21155 (b), it also includes major transit stops that are included in the applicable regional transportation plan.

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 set forth by the City.

On February 10, 2016, the City issued Zoning Information File No. 2452 to clarify the locations of transit priority areas within the City, which restate that aesthetic impacts shall not be considered a significant impact on the environment under the provisions of SB 743. Specifically, Zoning Information File No. 2452 states that impacts to visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact, as defined by the City, shall not be considered an impact for infill projects within transit priority areas pursuant to CEQA. As shown on the City’s Zone Information and Map Access System (ZIMAS) website, the Project Site is located in a transit priority area. Thus, the Project’s aesthetic (and parking) impacts are not considered significant impacts on the environment pursuant to PRC Section 21099. No further assessment of the Project’s aesthetics impacts is required. However, an assessment of the Project’s aesthetics impacts is provided below for informational purposes only.

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

Less Than Significant Impact. The Project Site is located in a highly urbanized area of the City, along the Sepulveda Boulevard corridor, which is developed with a mix of commercial and residential uses. Views in the vicinity of the Project Site and/or that include the Project Site are limited to those of existing development. Any views that might be considered scenic (such as those of mountain ranges, the ocean, or Downtown skyline) are not readily available from the Project Site area due to distance and intervening development. As such, the proposed development of the Project Site would not have a substantial adverse effect on a scenic vista. Pursuant to PRC Section 21099, the Project’s aesthetics impacts would not be significant.

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

No Impact. The Project Site is not located within view from a state scenic highway. Thus, the Project would not damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings, within a state scenic highway. Pursuant to PRC Section 21099, the Project's aesthetics impacts would not be significant.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

No Impact. The Project Site area is highly urbanized. Parcels surrounding the Project Site consist of a variety of mid- to high-intensity commercial, industrial, and residential uses. To the south, parcels fronting Sepulveda Boulevard are similarly zoned and designated C4-1 and General Commercial, respectively. The lot abutting the Project Site to the south is improved with a four-story 133-unit hotel (Extended Stay America) with associated surface parking. Continuing south along the westerly Sepulveda Boulevard frontage is a four-story warehouse building (Public Storage); an eight-story (91 feet tall), 180-unit multi-family residential building; and a five-story (92 feet tall), 176-unit multi-family residential building (currently under construction). To the east across Sepulveda Boulevard, lots are zoned C2-1 (Commercial Zone, Height District 1), with a General Plan land use designation of Regional Commercial. The northern portion of these lots is improved with an approximately nine-story (150 feet tall) office building, and the southern portion of these lots is improved with the Howard Hughes Center. To the west across Arizona Avenue, lots are zoned [Q]M1-1VL (Qualified Condition, Limited Industrial Zone, Height District 1), with a General Plan land use designation of Limited Industrial.

The Project Site is zoned C4-1 (Commercial Zone, Height District 1) with a General Plan land use designation of General Commercial. The proposed uses are allowed under the existing zoning and land use designation for the site. The proposed building would contain approximately 365,623 square feet of floor area, with a floor area ratio (FAR) of 3.85:1, and would reach 96 feet, 4 inches in height as measured to the top of the elevator structure. The massing, height, and setbacks of the Project would comply with those allowed under the existing zoning for the site as well as the provisions of State density bonus law. In addition, the Project would be required to undergo Site Plan Review to ensure consistency with all applicable City standards. Thus, the Project would not conflict with applicable zoning or other regulations governing scenic quality. Pursuant to PRC Section 21099, the Project's aesthetics impacts would not be significant.

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

Less Than Significant Impact. The Project Site is located in a highly urbanized area of the City, along the Sepulveda Boulevard corridor, which is developed with a mix of commercial and residential uses, and in close proximity to Interstate 405. The Project Site is bounded by Centinela Avenue to the north, a surface parking lot associated with a hotel to the south, Arizona Avenue to the west, and Sepulveda Boulevard to the east. The northern portion of the Project Site is currently improved with a single-story, multi-tenant commercial plaza and a single-story, multi-tenant industrial building, both with associated surface parking. The southern portion of the site is improved with an approximately 7,760-square-foot diner (Dinah's Family Restaurant) and associated surface parking. Other uses in the greater Project Site area include a dense mix of commercial and residential uses. All existing development on and surrounding the Project Site includes sources of existing light and glare, typical of an urban area. The Project would include interior and exterior lighting that complies with the Los Angeles Municipal Code (LAMC) provision that requires minimizing the effect of the new sources of lighting. Specifically, LAMC Section 91.0117(a) requires that no exterior light source may cause more than two foot-candles (21.5 lx) of lighting intensity or generate direct glare onto exterior glazed windows or glass doors; elevated habitable porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units. Consequently, no substantial changes in nighttime illumination would occur that would adversely affect nighttime views in the area and prevent spillover lighting. Also, the Project would use non-reflective glass. Thus, the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Pursuant to PRC Section 21099, the Project's aesthetics impacts would not be significant.

Cumulative Impacts

There are six related projects in the vicinity of the Project Site (refer to Table 3-2 on page 37 of the *Transportation Assessment* prepared for the Project, included in Appendix I). Three of the related projects (LA1, LA4, and CC2) are transit-priority projects in designated transit-priority areas and similar to the Project, pursuant to PRC Section 21099 aesthetics (and parking) impacts associated with these related project would not be significant. The other three related projects include infill development in highly urbanized areas. None of these related projects shares scenic resources in common with the Project. Additionally, none of these related projects is visible from a scenic highway. The degree to which these related projects would comply with regulations governing scenic quality would be considered on a project-by-project basis by their respective lead agencies, and the related projects would be required to comply with applicable design standards as enforced by the lead agencies. Because the related projects are infill development in a highly urbanized area, the potential increase in light and glare would be negligible, as the related projects would replace existing uses with existing sources of

light and glare and would be required to comply with existing regulations related to lighting and low-glare building materials. No significant cumulative aesthetics impacts would occur.

II. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest 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"/>
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) 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 Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site is not included in the Important Farmland category.¹ Therefore, the Project would not 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.

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

No Impact. The Project Site is not zoned for agricultural use, and the site is not under Williamson Act contract.² Therefore, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 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. The Project Site is not zoned as forest land or timberland, nor does the site contain any forest land or timberland. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project Site does not contain any forest land. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project Site and surrounding area are developed with urban land uses. No agricultural uses are located on the Project Site or within the area. Therefore, no impacts related to this issue would occur.

¹ *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland, 1998.*

² *Ibid.*

Cumulative Impacts

The six related projects listed on Table 3-2 on page 37 of the *Transportation Assessment* prepared for the Project (refer to Appendix I) are located in highly urban areas. Neither the Project Site nor any of the related projects' sites are used or designated as agricultural land or forest land. Therefore, no cumulative impacts related to agricultural resources would occur.

III. AIR QUALITY

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The analysis provided below is primarily based on technical data prepared by NTEC (refer to Appendix B).

Environmental Setting

Regulatory Framework

Federal

Clean Air Act

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years, with the most recent amendments occurring in 1990. At the federal level, the United States Environmental Protection Agency (USEPA) is responsible for implementing some portions of the CAA (e.g., certain mobile source and other requirements). Other portions of the CAA (e.g., stationary source requirements) are implemented by state and local agencies. In California the California Clean Air Act (CCAA) is administered by the California Air Resources Board (CARB) at the state level

and by the air quality management districts and air pollution control districts at the regional and local levels.

The CAA governs the establishment, review, and revision, as appropriate, of the National Ambient Air Quality Standards (NAAQS), which provide protection for the nation's public health and the environment. NAAQS are based on quantitative characterizations of exposures and associated risks to human health and the environment. The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress towards attainment and the incorporation of additional sanctions for failure to attain or to meet interim milestones. NAAQS have been established for seven major air pollutants: carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), PM_{2.5} (particulate matter, 2.5 microns), PM₁₀ (particulate matter, 10 microns), sulfur dioxide (SO₂), and lead (Pb).

The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are shown on Table III-1. USEPA has classified the Los Angeles County portion of the South Coast Air Basin (Basin) as a nonattainment area for O₃, PM_{2.5}, and lead.

State

California Clear Air Act

In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the CCAA. In California the CCAA is administered by CARB at the state level and by the air quality management districts and air pollution control districts at the regional and local levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for meeting the state requirements of the CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS. CAAQS are generally more stringent than their corresponding NAAQS and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CAAQS define clean air: they represent the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without any harmful effects on people or the environment.

**Table III-1
State and Federal Ambient Air Quality Standards and Attainment for L.A. County**

Pollutant	Averaging Period	California		Federal	
		Standard	Attainment Status	Standard	Attainment Status
Ozone – O ₃	1-hour	0.09 ppm (180 µg/m ³)	Non-attainment	-	-
	8-hour	0.070 ppm (137 µg/m ³)	Non-attainment	0.070 ppm (137 µg/m ³)	Non-attainment
Respirable Particulate Matter – PM ₁₀	24-hour	50 µg/m ³	Non-attainment	150 µg/m ³	Attainment
	Annual Arithmetic Mean	20 µg/m ³	Non-attainment	-	-
Fine Particulate Matter – PM _{2.5}	24-hour	-	-	35 µg/m ³	Non-attainment
	Annual Arithmetic Mean	12 µg/m ³	Non-attainment	12 µg/m ³	Non-attainment
Carbon Monoxide – CO	1-hour	20 ppm (23 mg/m ³)	Attainment	35 ppm (40 mg/m ³)	Attainment
	8-hour	9.0 ppm (10 mg/m ³)	Attainment	9 ppm (10 mg/m ³)	Attainment
Nitrogen Dioxide – NO ₂	1-hour	0.18 ppm (338 µg/m ³)	Attainment	100 ppb (188 µg/m ³)	Attainment
	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	Attainment	53 ppb (100 µg/m ³)	Attainment
Sulfur Dioxide – SO ₂	1-hour	0.25 ppm (655 µg/m ³)	Attainment	75 ppb (196 µg/m ³)	Attainment
	24-hour	0.04 ppm (105 µg/m ³)	Attainment	-	-
Lead – Pb	30-day average	1.5 µg/m ³	Attainment	-	-
	Calendar Quarter	-	-	0.15 µg/m ³	Non-attainment

Source: CARB, Area Designations Maps/State and National, www.arb.ca.gov/desig/adm/adm.htm. Accessed August 6, 2021.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant

if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the non-desert Los Angeles County portion of the Basin is designated as a nonattainment area for O₃, PM₁₀, and PM_{2.5}. The state standards and attainment/non-attainment are also shown on Table III-1.

California Air Toxics Program

CARB's Air Toxics Program was established in 1983 in response to the adoption of AB 1807, the Toxic Air Contaminant Identification and Control Act. AB 1807 directs CARB and the State Office of Environmental Health Hazard Assessment (OEHHA) to identify toxic air contaminants (TACs) and determine whether any regulatory action is necessary to reduce their risks to public health. Substances formally identified as TACs include diesel particulate matter and environmental tobacco smoke.

Air Quality and Land Use Handbook: A Community Health Perspective

Released by CARB in 2005, the *Air Quality and Land Use Handbook: A Community Health Perspective* provides recommendations regarding the siting of new sensitive land uses near potential sources of TACs (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gas stations), as well as the siting of new TAC sources in proximity to existing sensitive land uses.³ The recommendations are advisory and should not necessarily be interpreted as defined "buffer zones"; if a project or sensitive land uses are within the siting distance, CARB recommends further analysis.

Regional

South Coast Air Quality Management District

The Project is located within the 6,745-square-mile Basin, which includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. It is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and the San Diego County line to the south. The South Coast Air Quality Management District (SCAQMD) is the agency principally responsible for air pollution control in the Basin. Specifically, SCAQMD is responsible for planning, implementing, and enforcing programs designed to attain and maintain CAAQS established by CARB and NAAQS established by the USEPA. All projects in the SCAQMD jurisdiction are subject to SCAQMD rules and regulations, including, but not limited to, the following:

³ CARB, *Air Quality and Land Use Handbook, A Community Health Perspective*, April 2005.

- Rule 401 Visible Emissions: This rule prohibits air discharge that results in a plume that is as dark as or darker than what is designed as No. 1 Ringelmann Chart by the United States Bureau of Mines for an aggregate of three minutes in any one hour.
- Rule 402 Nuisance: This rule prohibits the discharge of “such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of people or 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.
- Rule 403 Fugitive Dust: This rule mandates that projects reduce the amount of particulate matter entrained in the ambient air as a result of fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions from any active operation, open storage pile, or disturbed surface area.

2016 Air Quality Management Plan

The 2016 Air Quality Management Plan (2016 AQMP) was adopted in April 2017 and represents the most updated regional blueprint for achieving federal air quality standards. It relies on emissions forecasts based on demographic and economic growth projections provided by the Southern California Association of Governments’ (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS).

Southern California Association of Governments

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties that is tasked with addressing regional issues relating to transportation, the economy, community development, and the environment. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain NAAQS. Additionally, SCAG is a co-producer, along with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin’s AQMP. The 2020-2045 RTP/SCS, SCAG’s latest long-range plan, continues to recognize that transportation investments and future land use patterns are inextricably linked, and acknowledges how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region. In short, the 2020-2045 RTP/SCS offers a blueprint for how Southern California can grow more sustainably. To this end, the 2020-2045 RTP/SCS land use pattern continues the trend of focusing new housing and employment in the region’s High Quality Transit Areas (HQTAs) and aims to enhance and build out the region’s transit network. At the time of the 2016-2040 RTP/SCS, HQTAs accounted for just 3 percent of total land in the SCAG region, but they are projected to accommodate 46 percent of the region’s future household growth and 55 percent of the region’s future employment

growth by 2040.⁴ HQTAs are a cornerstone of land use planning best practice in the SCAG region, and studies by the California Department of Transportation, the USEPA, and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption.

Local

City of Los Angeles General Plan Air Quality Element

The City's General Plan Air Quality Element identifies policies and strategies for advancing the City's clean air goals. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and air quality goals. The Air Quality Element includes the following six key goals:

- Goal 1:** Good air quality in an environment of continued population growth and healthy economic structure.
- Goal 2:** Less reliance on single-occupant vehicles with fewer commute and non-work trips.
- Goal 3:** Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand management techniques.
- Goal 4:** Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.
- Goal 5:** Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting.
- Goal 6:** Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

Pollutants and Effects

State and Federal Criteria Pollutants

Air quality is measured by the ambient air concentrations of seven pollutants that have been identified by the USEPA due to their potentially harmful effects on public health and

⁴ SCAG, *Final 2016-2040 RTP/SCS, April 2017*. HQTAs are defined as areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours.

the environment. These “criteria air pollutants” include carbon monoxide, ground-level ozone, nitrogen dioxide, sulfur dioxide, particulate matter ten microns or less in diameter, particulate matter 2.5 microns or less in diameter, and lead. The descriptions of each criteria air pollutant and their health effects discussed below are based on information provided by the USEPA and the SCAQMD.^{5,6}

Carbon Monoxide – CO

CO is a colorless and odorless gas that is released when something is burned. Outdoors, the greatest sources of CO are cars, trucks, and other vehicles or machinery that burn fossil fuels. Unvented kerosene and gas space heaters, leaking chimneys and furnaces, and gas stoves can release CO and affect air quality indoors. Breathing air with elevated concentrations of CO reduces the amount of oxygen that can be transported via the blood stream and can lead to weakened heart contractions; as a result, CO inhalation can be particularly harmful to people with chronic heart disease. At moderate concentrations, CO inhalation can cause nausea, dizziness, and headaches. High concentrations of CO may be fatal; however, such conditions are not likely to occur outdoors.

Ozone – O₃

O₃ is a colorless gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) undergo slow photochemical reactions in the presence of ultraviolet sunlight. The greatest source of VOC and NO_x emissions is automobile exhaust. O₃ concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperatures are favorable to its formation. Elevated levels of O₃ irritate the lungs and airways and may cause throat and chest pain, as well as coughing, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to the scarring of lung tissue and reduced lung efficiency.

Nitrogen Dioxide – NO₂

NO₂ is primarily a byproduct of fossil fuel combustion and is therefore emitted by automobiles, power plants, and industrial facilities. The principal form of nitrogen oxide produced by fossil fuel combustion is nitric oxide (NO), which reacts quickly to form NO₂, creating the mixture of NO and NO₂ commonly called NO_x. NO₂ absorbs blue light and results in reduced visibility and a brownish-red cast to the atmosphere. NO₂ also contributes to the formation of PM₁₀. Nitrogen oxides irritate the nose and throat and increase susceptibility to respiratory infections, especially in people with asthma. Longer exposures to elevated concentrations of NO₂ may even contribute to the development of asthma. The principal concern of NO_x is as a precursor to the formation of ozone.

⁵ USEPA, *Criteria Air Pollutants*, www.epa.gov/criteria-air-pollutants

⁶ SCAQMD, *Final 2012 Air Quality Management Plan*, February 2013.

Sulfur Dioxide – SO₂

Sulfur oxides (SO_x) are compounds of sulfur and oxygen molecules. SO₂ is the predominant form found in the lower atmosphere and is a product of burning sulfur or sulfur-containing materials. Major sources of SO₂ include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. SO₂ may aggravate lung diseases, especially bronchitis. It also constricts breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO₂ may cause wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO₂, and long-term exposure to both pollutants leads to higher rates of respiratory illnesses.

Particulate Matter – PM₁₀ and PM_{2.5}

The human body naturally prevents the entry of larger particles into itself. However, smaller particles less than 10 microns (PM₁₀) or even less than 2.5 microns (PM_{2.5}) in diameter can enter the body and become trapped in the nose, throat, and upper respiratory tract. Here, these particulates may aggravate existing heart and lung diseases, affect the body's defenses against inhaled materials, and damage lung tissue. Those most sensitive to PM₁₀ and PM_{2.5} include children, the elderly, and those with chronic lung and/or heart disease.

Lead – Pb

Airborne lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting and other metal processing activities are the primary sources of lead emissions. The lead effects most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ.

Toxic Air Contaminants – TACs

TACs refer to a diverse group of “non-criteria” air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above, but because their effects tend to be local rather than regional. As discussed earlier, CARB and OEHHA determine if a substance should be formally identified, or “listed,” as a TAC in California. A complete list of these substances is maintained on CARB's website.⁷

One key TAC is diesel particulate matter (diesel PM), which is emitted in diesel engine exhaust. Released in 2021 by the SCAQMD, the Multiple Air Toxics Exposure Study V (MATES V) determined that about 88 percent of the carcinogenic risk from air toxics in

⁷ CARB, *Toxic Air Contaminant Identification List*, www.arb.ca.gov/toxics/id/taclist.htm, last reviewed by CARB July 18, 2011.

the Basin is attributable to mobile source emissions. Of the three carcinogenic TACs that constitute the majority of the known health risk from motor vehicle traffic – diesel PM from primarily trucks, and benzene and 1,3-butadiene from passenger vehicles – diesel PM is responsible for the greatest potential cancer risk from vehicle traffic.⁸ Overall, diesel PM was found to account for, on average, about 50 percent of the air toxics risk in the Basin.⁹ In addition to its carcinogenic potential, diesel PM also may contribute to increased respiratory and cardiovascular hospitalizations, worsened asthma and other respiratory symptoms, decreased lung function in children, and premature death for people already with heart or lung disease. Those most vulnerable to the non-cancer health effects of diesel PM are children whose lungs are still developing and the elderly who may have other chronic health problems.¹⁰

Volatile Organic Compounds – VOCs

VOCs are typically formed from the combustion of fuels and/or released through the evaporation of organic liquids. Some VOCs are also classified by the state as toxic air contaminants, though there are no VOC-specific ambient air quality standards. Once emitted, VOCs can mix in the air with other pollutants (e.g. NO_x, CO, SO₂, etc.) and contribute to the formation of photochemical smog.

Existing Conditions

As noted previously, the Project is located within the 6,745-square-mile Basin that includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. Air quality within the Basin is influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry. These sources in addition to the topography and climate of Southern California combine to make the Basin an area of high air pollution potential. Particularly, ambient pollution concentrations recorded in the Los Angeles County portion of the Basin are among the highest in the four counties comprising the Basin. The USEPA has classified Los Angeles County as a nonattainment area for O₃, PM_{2.5}, and lead, meaning that the Basin does not meet NAAQS for these pollutants. Additionally, this portion of the Basin also does not meet CAAQS for O₃, PM₁₀, and PM_{2.5}. Table III-1 summarizes CAAQS and NAAQS and the attainment status for Los Angeles County with respect to each criteria pollutant.

Air Quality Monitoring Data

The SCAQMD monitors air quality conditions at 38 source receptor areas (SRA) throughout the Basin. The Project Site is located in SCAQMD's SRA No. 2, "Northwest Coastal LA County." Table III-2 shows pollutant levels, State and federal standards, and

⁸ CARB, *Air Quality and Land Use Handbook: A Community Health Perspective*, April 2005.

⁹ SCAQMD, *Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES V)*, 2021.

¹⁰ CARB, *Overview: Diesel Exhaust & Health*, ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

the number of exceedances recorded in SRA No. 2 from 2017 through 2019. The one-hour State standard for O₃ was exceeded two times during this three-year period, and the federal standard was exceeded six times. CO and NO₂ levels did not exceed their respective CAAQS or NAAQS during this period. Data for PM₁₀, PM_{2.5}, SO₂, and Pb is not available for the most recent years.

**Table III-2
Ambient Air Quality Data – SRA No.2 “Northwest Coastal LA County”**

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of State/Federal Standards Exceedance		
	2017	2018	2019
Ozone – O₃			
Maximum 1-hour Concentration (ppm)	0.099	0.094	0.086
Days > 0.09 ppm (State 1-hour standard)	1	0	1
Days > 0.070 ppm (Federal 8-hour standard)	3	2	1
Carbon Monoxide – CO			
Maximum 1-hour Concentration (ppm)	2.0	1.6	1.9
Days > 20 ppm (State 1-hour standard)	0	0	0
Maximum 8-hour Concentration (ppm)	1.2	1.3	1.2
Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide – NO₂			
Maximum 1-hour Concentration (ppm)	0.0557	0.0647	0.0488
Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM₁₀			
Maximum 24-hour Concentration (µg/m ³)	N/A	N/A	N/A
Days > 50 µg/m ³ (State 24-hour standard)	N/A	N/A	N/A
PM_{2.5}			
Maximum 24-hour Concentration (µg/m ³)	N/A	N/A	N/A
Days > 35 µg/m ³ (Federal 24-hour standard)	N/A	N/A	N/A
Sulfur Dioxide – SO₂			
Maximum 24-hour Concentration (ppb)	N/A	N/A	N/A
Days > 0.04 ppm (State 24-hour standard)	N/A	N/A	N/A
Lead - Pb			
Maximum Monthly Average Concentration (µg/m ³)	N/A	N/A	N/A
Maximum 3-Month Rolling Averages (µg/m ³)	N/A	N/A	N/A
<i>N/A = data not available ppm = parts per million of air, by volume µg/m³ = micrograms per cubic meter Source: SCAQMD Historical Data By Year, www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year. Accessed August 6, 2021.</i>			

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. Generally speaking, sensitive land uses, or sensitive receptors, are those where sensitive individuals are most likely to spend time. Individuals most susceptible to poor air quality include children, the elderly, athletes, and those with cardiovascular and chronic respiratory diseases. As a result, land uses sensitive to air quality may include schools (i.e., elementary schools or high schools), child care centers, parks and playgrounds, long-term health care facilities, rehabilitation facilities, convalescent facilities, retirement facilities, residences, and athletic facilities. For the purposes of CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours. The SCAQMD does not consider commercial and industrial facilities to be sensitive receptors because employees do not typically remain onsite at such facilities for 24 hours, but are present for shorter periods (such as eight hour shifts). However, the SCAQMD suggests that LSTs based on shorter averaging periods, such as the NO₂ and CO LSTs, may also be applied to receptors such as commercial and industrial facilities since it is reasonable to assume that workers at these sites may be present for up to eight hours.¹¹ Sensitive receptors in the vicinity of the Project include, but are not limited to, the following:

- Residential Land Uses: Residential uses in the vicinity of the Project Site are located along Sepulveda Boulevard and in a residential neighborhood located to the south and west of the Project Site. The closest residential land use (Hanover West LA at 6711 Sepulveda Boulevard) is located approximately 350 feet south of the Project Site.
- Extended Stay America – Los Angeles – LAX Airport: This hotel is located at 6531 Sepulveda Boulevard, approximately 80 feet south of the Project Site. It is possible that some guests may be present at the location for periods of 24 hours or more. As a result, this hotel may be considered a sensitive receptor pursuant to the previously discussed SCAQMD methodology.

Sensitive receptors that are located at greater distances from the Project Site than the previously identified receptors would experience lesser impacts.

Existing Project Site Emissions

Pollutant emissions associated with existing uses on the Project Site are shown on Table III-3.

¹¹ SCAQMD, *Final Localized Significance Threshold Methodology*, June 2003. Revised July 2008.

**Table III-3
Existing Daily Operations Emissions**

Emissions Source	Emissions (pounds/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area	0.8	<0.1	<0.1	<0.1	<0.1	<0.1
Energy	0.1	0.7	0.6	<0.1	0.1	0.1
Mobile Sources	4.1	3.9	32.9	0.1	5.7	1.6
Net Regional Total	5.0	4.6	33.5	0.1	5.8	1.6
<i>Source: NTEC, 2021. Based on CalEEMod 2020.4.0 model runs. Refer to Appendix B.</i>						

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

No Impact. The analysis below assesses the Project’s consistency with the SCAQMD’s 2016 AQMP and SCAG’s latest 2020-2045 RTP/SCS. As noted previously, the 2016 AQMP’s projections for achieving state and federal air quality goals are based on population, housing, and employment trend assumptions in the 2016-2040 RTP/SCS that are largely based on growth forecasts from local governments like the City and thus, a project is consistent with the 2016 AQMP, in part, if the project is consistent with the population, housing, and employment assumptions and smart growth policies that were used in the formation of the AQMP.

The Project’s development would not exceed the growth assumptions of the 2016-2040 RTP/SCS (or of the latest 2020-2045 RTP/SCS, as discussed in response to Checklist topic XIV [Population and Housing]).

The 2016–2040 RTP/SCS includes the following proposed growth forecast for population, households, and employment for the City 2040:¹²

- Population: 3,845,500 persons in 2012 and 4,609,400 in 2040;
- Households: 1,325,500 households in 2012 and 1,690,300 in 2040; and
- Employment: 1,696,400 jobs in 2012 and 2,169,100 in 2040.

Table III-4 lists SCAG’s forecasts for population, housing, employment, and persons-per-household rate for the City, as well as the number and percent change.¹³

¹² SCAG, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Current Demographics and Forecast, Table 11, page 24:

http://scagrtpscs.net/Documents/2016/draft/d2016RTPSCS_DemographicsGrowthForecast.pdf.

¹³ Employment information is provided for informational purposes only.

**Table III-4
Population, Housing, Employment,
and Persons-per-Household Forecasts for the City
Based on the 2016-2040 RTP/SCS**

Year	Population	Households	Employment¹	Person/Households
2021 ²	4,091,039	1,442,757	1,848,339	2.84
2026 ³	4,227,450	1,507,900	1,932,750	2.80
2040	4,609,400	1,690,300	2,169,100	2.73
Change 2021 to 2026³				
Number Changed	+136,411	+65,143	+84,411	-0.03
Percent Changed	+3.33%	+4.51%	+4.56%	-1.13%
Change 2026 to 2040				
Number Changed	+381,950	+182,400	+236,350	-0.08
Percent Changed	+9.03%	+12.20%	+12.22%	-2.73%
¹ Employment information is provided for informational purposes only. ² Population, housing and employment rate data for 2021 (baseline year) and 2026 (anticipated buildout year of the Project) was calculated based on a linear interpolation of growth projections in SCAG's 2016-2040 RTP/SCS. ³ Represents a comparison of baseline year to Project buildout year.				

The 2.205-acre Project Site is currently developed with approximately 24,000 square feet of commercial uses, Dinah's restaurant, and associated surface parking. With the exception of Dinah's restaurant use, all existing uses would be demolished and removed from the Project Site, and the site would be developed with an eight-story, 362-unit multi-family residential building, with approximately 3,700 square feet of ground-floor restaurant (in addition to Dinah's). Forty-one of the multi-family residential units would be restricted to Very Low Income households. Based on *Transportation Assessment* prepared for the Project (refer to Appendix I), the Project would add a residential population of approximately 852 people to the Project Site. As shown on Table III-5, the Project's residential population and number of housing units would represent less than one percent of the forecasted growth between 2021 and 2026 and 2026 and 2040. Thus, the Project's population and housing growth would fall within the forecasted growth for the City. Thus, growth associated with the Project has been accounted for in the current AQMP.

**Table III-5
Project Estimated Comparison for the City of Los Angeles
Based on the 2016-2040 RTP/SCS**

Project	Comparison Amount ¹	% of Comparison
As compared to Growth Forecast from 2021 to 2026		
852 residents	+136,411	0.62%
362 units	+65,143	0.56%
As compared to Growth Forecast from 2026 to 2040		
852 residents	+381,950	0.22%
362 units	+236,350	0.19%
¹ Refer to Table III-4.		

The Project Site is zoned C4-1, which permits the site’s proposed land uses. As such, 2016-2040 RTP/SCS assumptions about population and employment growth in the City accommodate the Project’s land uses on this site. The 2020-2045 RTP/SCS (as well as its previous iteration) assumes a significant increase in multi-family housing built in infill locations near bus corridors and other transit infrastructure, in some cases even outpacing what is currently anticipated by local general plans. Development of the Project would be consistent with this land use pattern and smart growth policies to increase housing density within HQTAs. Not only would the Project be located within an HQTA but would also contribute to SCAG’s goals of encouraging growth of walkable and mixed-use communities with ready access to transit infrastructure and employment. The 2020-2045 RTP/SCS specifically encourages the development of medium- and high-density housing to create strategic nodes along existing or future transit corridors to better leverage transit investments and allow for the replacement of under-performing, auto-oriented, single-story retail uses. By developing dense residential housing in a low-intensity infill location (i.e., an auto-oriented strip mall with large surface parking) that is also within an HQTA and a “Pedestrian Enhanced District” (per the City’s Mobility Plan 2035), the Project would contribute directly to SCAG’s goals. The Project Site’s location would provide abundant opportunity for residents, employees, and other project users to reduce vehicle trips, specifically vehicle miles traveled (VMT).

In addition to the 2016 AQMP and 2020-2045 RTP/SCS, the City of Los Angeles General Plan Air Quality Element also identifies policies and strategies for advancing the City’s clean air goals. As shown on Table III-6, the Project would be consistent with the applicable policies of the Air Quality Element.

Table III-6

Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
<p>Policy 1.3.1 – Minimize particulate emissions from construction sites.</p>	<p>Consistent: The Project would minimize particulate emissions during construction through implementation of best construction practices and/or SCAQMD rules.</p>
<p>Policy 1.3.2 – Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.</p>	<p>Consistent: The Project would not include the development of any unpaved roads or parking lots.</p>
<p>Policy 2.1.1 – Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.</p>	<p>Consistent: The Project’s proximity to high quality transit options and its inclusion of 214 bicycle parking spaces would encourage the reduction of vehicle trips and VMT. A detailed analysis of the Project’s VMT impacts is included in Appendix I and discussed in response to Checklist Question XVII(b); as discussed there, Project impacts related to VMT would be less than significant.</p>
<p>Policy 2.1.2 – Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors in order to reduce work trips.</p>	<p>Consistent: In addition to its proposed residential use, the Project also includes restaurant uses. Telecommuting is not an option for restaurant workers. However, the Project Site’s proximity to multiple transit lines and provision of bicycle parking spaces will facilitate a reduction in single-occupant vehicle trips, and as discussed in response to Checklist Question XVII(b), Project impacts related to VMT would be less than significant.</p>
<p>Policy 2.2.1 – Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans, and ridesharing subsidies.</p>	<p>Consistent: The infill Project’s proximity to multiple high quality transit options and its inclusion of 214 bicycle parking spaces would encourage the reduction of vehicle trips and VMT. A detailed analysis of the Project’s VMT impacts is included in Appendix I and discussed in response to Checklist Question XVII(b); as discussed there, Project impacts related to VMT would be less than significant.</p>
<p>Policy 2.2.2 – Encourage multi-occupant vehicle travel and discourage single-</p>	<p>Consistent: The Project’s proximity to multiple high quality transit options and its</p>

Table III-6

Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
occupant vehicle travel by instituting parking management practices.	inclusion of 214 bicycle parking spaces would encourage the reduction of vehicle trips and VMT. In addition, the Project will utilize reduced residential parking standards under State density bonus law as well as commercial parking reductions under the City’s bicycle parking ordinance. A detailed analysis of the Project’s VMT impacts is included in Appendix I and discussed in response to Checklist Question XVII(b); as discussed there, Project impacts related to VMT would be less than significant.
Policy 2.2.3 – Minimize the use of single-occupant vehicles associated with special events or in areas and in times of high levels of pedestrian activities.	Not Applicable: The Project would not include any facilities for the types of special events referenced by this policy.
Policy 3.2.1 – Manage traffic congestion during peak hours.	Consistent: A detailed analysis of the Project’s VMT impacts is included in Appendix I and discussed in response to Checklist Question XVII(b); as discussed there, Project impacts related to VMT would be less than significant.
Policy 4.1.1 – Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	Consistent: The Project is being entitled through the City, which coordinates with SCAG, Metro, and other regional agencies on the management of land use, air quality, and transportation policies.
Policy 4.1.2 – Ensure that project level review and approval of land use development remains at the local level.	Consistent: The Project would be entitled and environmentally cleared at the local level.
Policy 4.2.3 – Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	Consistent: The Project would include 214 bicycle parking spaces. Additionally, the Project would conform to all design element requirements of the City’s Complete Streets Design Guide so that Project features do not hinder sight distance, mobility, or accessibility. Sepulveda Boulevard is designated a “Comprehensive Transit Enhanced Street” and “Neighborhood Enhanced Network” by the City’s Mobility Plan 2035.

**Table III-6
Project Consistency with City of Los Angeles General Plan Air Quality Element**

Strategy	Project Consistency
	Sepulveda Boulevard also contains Class II bicycle lanes. Sepulveda Boulevard and nearby Howard Hughes Parkway are designated “Pedestrian Enhanced Districts” by the City’s Mobility Plan 2035. It should be noted that the Project is less than a quarter-mile walk from the Howard Hughes Center, a pedestrian-oriented major retail destination. As noted earlier, the Project is located in an HQTAs. The Project would include 48 EV charging stalls, and 96 spaces would be EV-capable.
Policy 4.2.4 – Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	Consistent: The Project’s air quality impacts are analyzed in this document, and as provided herein, all Project impacts with respect to air quality would be less than significant.
Policy 4.2.5 – Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	Consistent: The Project’s proximity to multiple high quality transit options and its inclusion of 214 bicycle parking spaces would encourage the reduction of vehicle trips and VMT. A detailed analysis of the Project’s VMT impacts is included in Appendix I and discussed in response to Checklist Question XVII(b); as discussed there, Project impacts related to VMT would be less than significant.
Policy 5.3.1 – Support the development and use of equipment powered by electric or low-emitting fuels.	Consistent: The Project would be designed to meet the applicable requirements of the State’s Green Building Standards Code and the City’s Green Building Code.
<i>Source: NTEC, 2021.</i>	

As discussed previously, Project-related growth would be consistent with 2016 AQMP projections that are themselves based on 2016-2040 RTP/SCS projections, and the Project’s infill location in a HQTAs and contribution to growth of a walkable and mixed-use community would be consistent with the latest regional land use planning strategies to reduce VMT and associated air emissions. As discussed below, pollutant emissions

associated with the Project’s construction and operations would neither exceed nor contribute to any exceedance of ambient air quality standards and thresholds, nor would they interfere with the AQMP’s attainment of air quality standards or interim emissions reductions. As a result, the Project would not conflict with or obstruct the implementation of any applicable air quality plans. Therefore, no impacts related to this issue would occur as a result of the Project.

b) 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?

Less Than Significant Impact. The Project would contribute to local and regional pollutant emissions during its construction and operational phases. However, as discussed below, the Project would not result in exceedances of SCAQMD daily thresholds for project-specific impacts that could subsequently cause cumulatively considerable increases in emissions of pollutants for which the Basin is designated as non-attainment.

Construction Emissions

Construction of the Project is anticipated to last approximately 41 months. During this time, a variety of diesel powered vehicles and equipment would be operated on-site. Demolition and grading for the Project would require vehicles such as an excavator, a bulldozer, a grader, and other heavy equipment. The building construction phase would require equipment such as forklifts and welding tools. Table III-7 summarizes the estimated construction schedule that was used to model the Project’s air quality impacts.

**Table III-7
Estimated Construction Schedule**

Phase	Duration
Sewer Relocation ¹	5 months
Demolition	3.5 months
Grading	4.5 months
Building Construction	29 months
Architectural Coatings ²	9 months
¹ Sewer relocation activities would overlap partially with demolition activities. ² Architectural coatings activities would overlap partially with building construction activities.	

The Project’s maximum daily regional and local emissions from construction, as estimated using SCAQMD’s CalEEMod 2020.4.0 model, are shown on Table III-8. Regional thresholds and LSTs for each air pollutant are also shown for comparison. As shown, the Project’s regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_x, CO, SO_x,

PM₁₀, or PM_{2.5}. Also, local emissions would not exceed SCAQMD LSTs for NO_x, CO, PM₁₀, or PM_{2.5}. As a result, the Project's construction-related air quality impacts would be less than significant.

**Table III-8
Maximum Regional and Localized Daily Construction Emissions**

	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Regional Emissions						
2023	1.3	22.0	15.0	0.1	1.1	0.7
2024	2.7	16.4	26.9	0.1	2.0	1.0
2025	15.8	16.8	30.0	0.1	2.2	1.1
2026	15.7	16.7	29.2	0.1	2.2	1.1
Maximum Regional Emissions	15.8	22.0	30.0	0.1	2.2	1.1
Regional Daily Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Localized Emissions						
2023	1.1	12.7	14.0	<0.1	0.9	0.5
2024	1.6	12.8	14.1	<0.1	0.5	0.5
2025	14.6	13.1	15.8	<0.1	0.5	0.5
2026	14.6	13.1	15.8	<0.1	0.5	0.5
Maximum Localized Emissions	14.6	13.1	15.8	<0.1	0.9	0.5
Localized Significance Threshold	-	103	562	-	4	3
Exceed Threshold?	-	No	No	-	No	No
<i>Source: NTEC, 2021. Refer to Appendix B.</i>						

Operational Emissions

Operational emissions associated with the Project were calculated using CalEEMod 2020.4.0. As shown below on Table III-9, development of the Project would not generate daily emissions would not exceed SCAQMD's regional significance thresholds for VOC, NO_x, CO, PM₁₀, and PM_{2.5}, nor would they exceed SCAQMD LSTs for NO_x, CO, PM₁₀, or PM_{2.5}. As a result, the Project's operational-related impacts on air quality would be less than significant.¹⁴

¹⁴ *The Project's preservation and continued operations of the existing Dinah's Family Restaurant would not constitute a change to the environment. As such, emissions associated with the operations of this restaurant have not been incorporated into the analysis and results shown on Table III-9. However, the Table III-9 analysis and results do account for operations emissions associated with this use's parking-related emissions, as its parking would be relocated from the existing surface parking lot (which would be demolished) to within the proposed parking garage.*

**Table III-9
Maximum Regional and Localized Operational Emissions**

Emissions Source	Emissions in lbs per day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area ¹	9.4	0.3	29.9	<0.1	0.2	0.2
Energy	0.1	1.3	0.6	<0.1	0.1	0.1
Mobile Sources	5.3	5.3	54.4	0.1	14.0	3.8
Project Regional Emissions	14.8	6.9	84.9	0.1	14.3	4.1
Regional Daily Thresholds	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Project Localized Emissions						
Project Localized Emissions	9.4	0.3	29.9	<0.1	0.2	0.2
Localized Significance Thresholds	-	103	562	-	2	1
Exceed Threshold?	-	No	No	-	No	No
¹ The Project's area source CO emissions are attributed entirely to landscaping equipment, as calculated by CalEEMod. However, it is unlikely that the Project would emit a maximum 29 pounds of CO per day as a result of on-site landscaping activities. The Project contains minimal landscaping that would not require daily or intensive maintenance activities. Nevertheless, even if this 29 pounds per day figure is assumed, the Project's daily CO emissions would still be well below the SCAQMD's 562 pound localized threshold for this pollutant.						
Source: NTEC, 2021. Refer to Appendix B.						

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. As discussed previously, the Project's construction emissions would not exceed the SCAQMD's regional significance thresholds. Construction emissions also would not exceed SCAQMD LSTs, meaning that nearby sensitive receptors generally located 25 meters or further from the Project would not be exposed to substantial pollutant concentrations of pollutant emissions.

The primary TAC that would be generated by construction activities is diesel PM, which would be released from the exhaust pipes of diesel-powered construction vehicles and equipment. According to SCAQMD methodology, health risks from carcinogenic air toxics such as diesel PM are usually quantified in terms of individual cancer risk, which is the likelihood that a person exposed to concentrations of TACs over a 30-year period every day will contract cancer based on standard risk-assessment methodology. However, the anticipated duration of construction activities associated with the Project's implementation is only approximately 41 months, and daily diesel PM emissions would vary considerably day by day, and by phase. As shown on Table III-8, the Project's maximum daily PM emissions, which include exhaust PM, would not exceed applicable regional thresholds and LSTs. Given these considerations, TAC emissions from the Project's construction phase would be less than significant.

As also discussed previously, the Project's operational emissions would not exceed SCAQMD regional significance thresholds or LSTs.

Additionally, the Project does not propose typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes, automotive repair facilities, or warehouse distribution facilities. As a result, the Project's operational phase emissions would not warrant the need for a health risk assessment, and this impact would be less than significant.

Though the Project would generate traffic that produces and contributes to off-site emissions, Project traffic generation would not result in exceedances of CO air quality standards at nearby roadways due to three key factors. First, CO hotspots are rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to the Project Site area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology and the increasing penetration of this technology in the vehicle fleet. As shown earlier on Table III-2, CO levels in the Project area are well-below federal and state standards, as are CO levels in the Basin itself. No exceedances of CO have been recorded at nearby monitoring stations for some time, and the Basin is currently designated as a CO attainment area for both CAAQS and NAAQS. Finally, the Project would not contribute to the levels of congestion and emissions necessary to trigger a potential CO hotspot. Therefore, the Project's potential to expose sensitive receptors to substantial CO concentrations as a result of CO hotspots would be less than significant.

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

No Impact. During the Project's construction phase, some of the diesel-engine-operated construction equipment could generate odor emissions. However, these emissions would be intermittent and temporary and would relatively quickly disperse into the atmosphere. Thus, the Project's construction phase would not produce odor emissions that would affect a substantial number of people.

The Project does not propose the types of land uses normally associated with odor emissions, such as industrial, solid waste, waste treatment, etc. The residential portion of the Project would not create unusual or objectionable odors during long-term operations. Proposed residential uses would not generate objectionable odors. The restaurant portion of the Project would produce food-cooking odor emissions. However, these emissions would be regulated by SCQAMD's Rule 402 (Nuisance), which states the following:

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public,

or which cause, or have a natural tendency to cause, injury or damage to business or property.

Additionally, the Project would be required to comply with California Health and Safety Code Section 41700(a), which states the following:

Except as otherwise provided in Section 41705, a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property.

Thus, Project operation would not produce odor emissions that would affect a substantial number of people. Therefore, Project impacts related to odor emissions would be less than significant. No further analysis of this issue is required.

Cumulative Impacts

SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable.¹⁵ Individual projects that generate emissions not in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions. As shown above, the Project's emissions would not exceed any of the SCAQMD's regional or localized significance thresholds. Therefore, the Project's contribution to cumulative air quality impacts would be less than significant.

¹⁵ SCAQMD, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf>, August 2003.

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 Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact. The Project Site is located in an urbanized and developed area of the City. The northern portion of the Project Site is currently improved with a single-story, multi-tenant commercial plaza and a single-story, multi-tenant industrial building, both with associated surface parking. The southern portion of the site is improved with Dinah's and associated surface parking. There are six trees located on the Project Site, five of which are alive. These include the following:¹⁶

- 2 carrotwood (*Cupaniopsis aracardioides*)
- 1 yellow pine (*Podocarpus macrophyllus*)
- 1 Mexican fan palm (*Washington robusta*)
- 1 pygmy date palm (*Phoenix roebelenii*)

Additionally, there are three trees located off site but adjacent to the Project Site that could be affected by the Project. These include the following:

- 1 southern magnolia (*Magnolia grandiflora*)
- 2 Brisbane box (*Lophostemon conferta*)

None of the on-site or off-site trees is considered a "protected tree or shrub," as defined by the City.¹⁷ However, these trees could potentially provide nesting sites for migratory birds. Thus, the Project would be required to comply with the Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season (February 15th to August 15th) to ensure that significant impacts to migratory birds would not occur. Compliance with these existing regulations would ensure impacts related to nesting birds would be less than significant.

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 Wildlife or U.S. Fish and Wildlife Service?

No Impact. The Project Site is located in an urbanized and developed area of the City. The northern portion of the Project Site is currently improved with a single-story, multi-tenant commercial plaza and a single-story, multi-tenant industrial building, both with

¹⁶ City of Los Angeles Tree Inventory Report Dinah's Restaurant, Cy Carlberg, March 25, 2021. Refer to Appendix A.

¹⁷ Protected trees and shrubs as defined by the City include oak trees (*Quercus* spp.) and Southern California black walnut trees (*Juglans californica*), western sycamore trees (*Platanus racemosa*), California bay trees (*Umbellularia californica*), Mexican elderberry shrubs (*Sambucus Mexicana*), and toyon (*Heteromeles arbutifolia*).

associated surface parking. The southern portion of the site is improved with Dinah's and associated surface parking. No riparian habitat or other sensitive natural community exist at the Project Site or in the immediate vicinity of the site. Thus, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, no impacts related to this issue would occur as a result of the Project.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project Site is located in an urbanized and developed area of the City. The northern portion of the Project Site is currently improved with a single-story, multi-tenant commercial plaza and a single-story, multi-tenant industrial building, both with associated surface parking. The southern portion of the site is improved with Dinah's and associated surface parking. No wetlands exist at the Project Site or in the immediate vicinity of the site. Thus, the Project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Therefore, no impacts related to this issue would occur as a result of the Project.

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?

No Impact. The Project Site is located in an urbanized and developed area of the City. The northern portion of the Project Site is currently improved with a single-story, multi-tenant commercial plaza and a single-story, multi-tenant industrial building, both with associated surface parking. The southern portion of the site is improved with Dinah's and associated surface parking. The Project Site is not part of a migratory wildlife corridor or native wildlife nursery. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. As stated previously, there are six trees located on the Project Site, five of which are alive. These include the following:¹⁸

¹⁸ *City of Los Angeles Tree Inventory Report Dinah's Restaurant, Cy Carlberg, March 25, 2021. Refer to Appendix A.*

- 2 carrotwood (*Cupaniopsis aracardioides*)
- 1 yellow pine (*Podocarpus macrophyllus*)
- 1 Mexican fan palm (*Washington robusta*)
- 1 pygmy date palm (*Phoenix roebelenii*)

Additionally, there are three trees located off site but adjacent to the Project Site that could be affected by the Project. These include the following:

- 1 southern magnolia (*Magnolia grandiflora*)
- 2 Brisbane box (*Lophostemon conferta*)

The Applicant would be required to plant replacement trees on or adjacent to the Project Sites in conformance with the City's Urban Forestry Division requirements for Project landscaping and tree replacement and planting. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. The Project Site is not subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan. Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

The six related projects listed on Table 3-2 on page 37 of the *Transportation Assessment* prepared for the Project (refer to Appendix I) are located in highly urban areas and likely do not contain significant biological resources, such as candidate, sensitive or special status species, riparian habitat, sensitive natural communities, and wetlands, and are not part of a wildlife corridor or significant ecological area (SEA) or subject to a habitat conservation plan, a natural community conservation plan, or other such plan. All related projects with existing trees would be required to comply with the requirements of the MBTA. Because the Project would not result in any impacts related to biological resources, the Project does not have the potential to contribute to any cumulative biological resources impacts. Therefore, cumulative impacts related to biological resources would be less than significant.

V. CULTURAL RESOURCES

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

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

Less Than Significant Impact. The analysis of Project impacts on historical resources below is based on the following (refer to Appendix C):

- *Historical Resources Technical Report, Architectural Resources Group, March 29, 2022.*

Regulatory Framework

National Register of Historic Places

The National Register of Historic Places (National Register) is the nation’s master inventory of known historic resources. Established under the auspices of the National Historic Preservation Act of 1966, the National Register is administered by the National Park Service (NPS) and includes buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level. Eligibility for in the National Register is addressed in National Register Bulletin (NRB) 15: How to Apply the National Register Criteria for Evaluation. NRB 15 states that in order to be eligible for the National Register, a resource must both: (1) be historically significant, and (2) retain sufficient integrity to adequately convey its significance. Significance is assessed by evaluating a resource against established eligibility criteria. A resource is considered significant if it satisfies any one of the following four National Register criteria:

- Criterion A (events): associated with events that have made a significant contribution to the broad patterns of our history;

- Criterion B (persons): associated with the lives of significant persons in our past;
- Criterion C (architecture): embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction;
- Criterion D (information potential): has yielded or may be likely to yield, information important in prehistory or history.

Once significance has been established, it must then be demonstrated that a resource retains enough of its physical and associative qualities – or integrity – to convey the reason(s) for its significance. Integrity is best described as a resource’s “authenticity” as expressed through its physical features and extant characteristics. Generally, if a resource is recognizable as such in its present state, it is said to retain integrity, but if it has been extensively altered then it does not. Whether a resource retains sufficient integrity for listing is determined by evaluating the following seven aspects of integrity defined by NPS:

- Location (the place where the historic property was constructed or the place where the historic event occurred);
- Setting (the physical environment of a historic property);
- Design (the combination of elements that create the form, plan, space, structure, and style of a property);
- Materials (the physical elements that were combined or deposited during a particular period of time and in a particular manner or configuration to form a historic property);
- Workmanship (the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory);
- Feeling (a property’s expression of the aesthetic or historic sense of a particular period of time); and
- Association (the direct link between an important historic event/person and a historic property).

Integrity is evaluated by weighing all seven of these aspects together and is ultimately a “yes or no” determination – that is, a resource either retains sufficient integrity or it does not. Some aspects of integrity may be weighed more heavily than others depending on the type of resource being evaluated and the reason(s) for its significance. Since integrity depends on a resource’s placement within a historic context, integrity can be assessed only after it has been established that the resource is significant, and under which criteria.

Generally, a resource must be at least 50 years of age to be eligible for listing in the National Register. Exceptions are made if it can be demonstrated that a resource less than 50 years old is (1) of exceptional importance, or (2) is an integral component of a historic district that is eligible for the National Register.

California Register of Historical Resources

The California Register of Historical Resources (California Register) is the authoritative guide to the State's significant historical and archeological resources. In 1992, the California legislature established the California Register "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change." The California Register program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for historic preservation grant funding; and affords certain protections under CEQA. All resources listed on or formally determined eligible for the National Register are automatically listed in the California Register. In addition, properties designated under municipal or county ordinances, or through local historic resources surveys, are eligible for listing in the California Register.

The structure of the California Register program is similar to that of the National Register, though the former more heavily emphasizes resources that have contributed specifically to the development of California. To be eligible for the California Register, a resource must first be deemed significant under one of the following four criteria, which are modeled after the National Register criteria listed above:

1. Criterion 1 (events): associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
2. Criterion 2 (persons): associated with the lives of persons important to local, California, or national history;
3. Criterion 3 (architecture): embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values;
4. Criterion 4 (information potential): has yielded, or has the potential to yield, information important to the prehistory or history of the local area, state, or the nation.

Similar to the National Register, the California Register also requires that resources retain sufficient integrity to be eligible for listing. A resource's integrity is assessed using the same seven aspects of integrity used for the National Register. However, since integrity

thresholds associated with the California Register are generally less rigid than those associated with the National Register, it is possible that a resource may lack the integrity required for the National Register but still be eligible for listing in the California Register.

There is no prescribed age limit for listing in the California Register, although California Register guidelines state that “sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource.”

Resources are automatically listed in the California Register if they are listed in or have been officially determined eligible for the National Register. State Historic Landmarks #770 and forward are also automatically listed in the California Register.

City of Los Angeles Cultural Heritage Ordinance

The local designation programs for the City of Los Angeles include Historic-Cultural Monument (HCM) designation for individual resources and the adoption of Historic Preservation Overlay Zones (HPOZs) for concentrations of buildings, commonly known as historic districts. The City of Los Angeles Cultural Heritage Ordinance (Chapter 9, Section 22.171 et seq. of the Los Angeles Administrative Code) defines an HCM as any site (including significant trees or other plant life located thereon), building, or structure of particular historic or cultural significance to the City of Los Angeles, meaning that it meets one or more of the following criteria:

1. It is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city, or community; or
2. It is associated with the lives of historic personages important to national, state, city, or local history; or
3. It embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

The City of Los Angeles established its Historic Preservation Overlay Zone (HPOZ) ordinance in 1979. The ordinance was revised in 1997, 2000, 2004, and 2018. According to Section 12.20.3 B.17 of the LAMC, a *Preservation Zone* is “any area of the City of Los Angeles containing buildings, structures, landscaping, natural features or lots having historic, architectural, cultural or aesthetic significance.”

Local historic preservation ordinances often include standards for determining whether a resource retains sufficient integrity to merit local historic designation, and this language can vary widely from municipality to municipality. Some local ordinances do not mention integrity at all. The Los Angeles Cultural Heritage Ordinance does not include language about integrity. When evaluating historical resources in municipalities where the historic

preservation ordinance does not provide guidance for assessing integrity, in accordance with best professional practices it is customary to use the National Register seven aspects of integrity to assess whether or not a resource retains sufficient integrity to convey its significance at the local level. For local eligibility in the City, the City typically considers integrity in determining whether a historical resource qualifies as a Historic-Cultural Monument (HCM), but practices greater flexibility when evaluating integrity for local designation than is the case for determining state or federal eligibility.

As with the National and California Registers, in assessing integrity at the local level, some aspects may be weighed more heavily than others depending on the type of resource being evaluated and the reason(s) for its significance. For example, if a property is significant as an excellent example of an architectural style, integrity of design, workmanship and materials may weigh more heavily than integrity of setting. In contrast, if a property is significant for its association with an important event or person, integrity of setting, feeling, and association may weigh more heavily than integrity of design.

Previous Evaluations and Designations

Dinah's Family Restaurant is not designated as a historic resource under any local, state, or federal registration program. In addition, it is not listed in the California Built Environment Directory (BERD). The building was identified as a potential historic resource in 2013 during the Los Angeles Citywide Survey (SurveyLA) of the Westchester-Playa del Rey Community Plan Area (CPA). The survey determined the building was potentially eligible under local Criterion 1 for its association with Dinah's, an iconic long-time restaurant which has been in continuous operation at this location since 1959. It was also determined eligible for listing in the National Register, California Register, and as a Los Angeles HCM under Criteria C/3/3 as an excellent example of Google architecture. The restaurant's three freestanding signs were also identified as contributing to the significance of the building.

Property History

General Setting

Dinah's Family Restaurant is located at located at 6521 S. Sepulveda Boulevard, in the Westchester community of Los Angeles. It sits near the southwest corner of Sepulveda Boulevard and Centinela Avenue, just south of Interstate 405 and approximately 15 miles southwest of downtown. Immediately north of the building is a one-story commercial strip mall, which it shares paved surface parking with. On the opposite (east) side of Sepulveda are large, multi-story office complexes, and to the west of the property is a low-scale commercial campus historically comprising the Westchester Industrial Tract (build 1950s – 70s), recorded through SurveyLA as the potential Arizona Circle Industrial Historic District. A few additional commercial properties as well as single-family residential neighborhoods surround the property to the south. The topography of the surrounding area slopes downward to the north.

The Project Site is developed with three primary buildings, including the Dinah's Family Restaurant (6521 S. Sepulveda Boulevard), a one-story industrial/mixed-use building (6511-6519 S. Sepulveda Boulevard/6508-6520 S. Arizona Avenue), and a one-story commercial strip mall (6501-6505 S. Sepulveda Boulevard/6502-6506 S. Arizona Avenue). These buildings are separated from one another by paved surface parking. An approximately 160-square-foot small locksmith shop (added 1986) is located east of the strip mall, at the northeast corner of the Project Site.

At the northwest corner of the Project Site, facing Centinela Avenue to the north, is a freestanding pole sign associated with Dinah's Family Restaurant building. The sign reads "Dinah's Fried Chicken" in dynamic backlit individual lettering; two backlit plastic boxes contain additional copy below the main signage. Originally sited equidistant between Sepulveda Boulevard and Arizona Avenue, the sign was moved further northwest to its current corner location in 1983; some of the sign's original lettering has also been replaced. At the northeast corner of the Project Site is a billboard, and along the east edge of the Site is another free standing sign. Neither the billboard nor the freestanding sign is associated with Dinah's Family Restaurant.

Two freestanding signs are located along the front of the Dinah's Family Restaurant building. Built in 1971, a pylon sign sits near the northeast corner of the building, highly visible along Sepulveda Boulevard. It consists of a backlit rectangular box with lettering that reads "Dinah's Family Restaurant." The box is supported by a rectangular pylon, and atop the box is a red lantern bounded by metal scrolls. Near the northwest corner of the building, in front of the take-out space, is a pole supporting a backlit plastic cylinder, intended to emulate a bucket of fried chicken. Originally installed in 1959, the current bucket replaced an older version with different text/lettering in 2013.

Dinah's Family Restaurant (6521 S. Sepulveda Boulevard)

Exterior

Constructed in 1957, the one-story restaurant building is largely rectangular in plan, except at its northeast corner where a circular volume (comprising a dining area) is located. Attached to the west end of the building is a small rectangular volume (added in 1959) that holds the restaurant's take-out department. The building has a combination low-pitched gable roof (east half) and flat roof (west half). The gable roof features a slightly upswept prow at the north gable end. The circular volume at the northeast corner is capped with a flat roof with wide eaves. All portions of the roof are covered in rolled asphalt, and mechanical equipment is visible on top of the roof. The exterior of the building is mostly clad in stucco with natural stone accent cladding in various locations. Windows are primarily grouped, fixed, and floor-to-ceiling with aluminum frames. Primary doors are fully glazed with aluminum frames, and back-of-house doors are flush metal. Most windows and doors appear to be replacements, with thicker frames than would have existed historically.

The building's primary façade faces north towards a parking lot. The east half, underneath the gable roof, is characterized by fixed floor-to-ceiling aluminum windows. An entrance volume composed of paired fully glazed aluminum doors and fixed windows with mirrored glass is located near the east end. The entrance was remodeled in 1976 so that the doors and surrounding glazing sit at a slight angle to the rest of the façade. To the east of the entrance, at the northeast corner of the building, the circular volume is lined with grouped fixed canted aluminum windows with stone cladding below. To the west of the entrance is a stucco wall devoid of fenestration. A stone planter approximately three feet high extends most of the length of the wall. The west end of the north façade, comprising the take-out space (added in 1959), is set back from the east end. It consists of floor-to-ceiling aluminum windows and a fully glazed aluminum door. It is fronted by an entrance canopy and a concrete pad and ramp surrounded by a metal railing. At the time of the site visit (August 2020), the majority of the building's north façade was obscured by a freestanding open tent sheltering a temporary outdoor dining area added during the COVID-19 pandemic that will presumably be removed after the pandemic.

The east façade is slightly set back from the sidewalk along Sepulveda Boulevard. The façade is divided into six bays, which are delineated by stone or stucco wingwalls. Each of the bays contains grouped fixed aluminum windows. Vertical U-groove metal cladding lines the lower half of the three northern bays. The second and third bay from the south end contain fully glazed aluminum doors. Metal and stucco awning structures are present above most of the bays. At the time of the site visit, the landscaped area in front of the east façade had been enclosed with a tall metal fence, and umbrellas had been added for temporary outdoor dining during the COVID-19 pandemic. It is presumed that these will be removed after the pandemic.

The west façade faces surface parking. The façade is primarily clad in stucco, except for at its north end where stone accent cladding and metal siding are present. The north end also has two fixed metal windows, and the center of the façade contains a recessed back-of-house entrance with a flush metal door. The south façade faces a concrete block perimeter wall. It is clad in stucco and lacks fenestration.

Interior

Restaurant

The interior of the restaurant consists of a large open dining area, an exhibition kitchen, a separate dining room, and a back-of-house kitchen with an employee break room to the south and restrooms to the north.

The main entrance provides access to a center open dining room. The room is filled with vinyl upholstered booths that seat two to four people and fixed tables. The stucco ceiling of the dining room is characterized by a series of dropped trapezoidal-shaped volumes terminated by round disks holding light fixtures. The fixtures are contemporary, and newspaper research indicates the color palette was previously orange and yellow rather

than its current red and blue. While the north and east walls of the dining room are largely glazed, the south wall, which divides the room from a smaller dining area, contains non-historic obscure glass and faux marble cladding. The center of the dining room floor, where seating is located, is covered in non-historic vinyl tile and carpet. Original terrazzo flooring is visible along the perimeter where waiter serving stations are located, as well as in the waiting area and the smaller circular dining area north of the main dining room. The terrazzo is composed of red, cream, and gray-colored flecks. Based on previous photographic documentation, the faux marble cladding, vinyl floor tile, carpet, and tables/table finishes were replaced in the last year to two to three years.

The northeast and southeast ends of the dining room seating are bound by two waiter serving stations. The stations are L-shaped and feature stainless steel counters and red metal cabinets. Previous photographic documentation indicates the cabinets were replaced in the 2010s.

To the north of the dining room is the waiting area, composed of vinyl upholstered seats and a cashier's station, which consists of a desk clad in non-historic faux marble (added in the last couple of years). The cashier's station is backed by a historic stone accent wall. To the northeast of the main dining room is a smaller dining area. This dining area contains vinyl upholstered semi-circular booths and fixed tables arranged in a circle. At the center of the space's floor is a red, yellow, and cream-colored terrazzo star; the rest of the floor is covered in contemporary carpet.

To the south of the main dining space is a separate dining room. This room is rectangular in plan and lined with vinyl upholstered booths and fixed tables on its north and south ends. The ceiling is plaster with can lighting, and the walls are clad in non-historic faux marble. The floor is covered in newer carpet and tile. The wall and floor finishes were replaced in the last couple of years.

To the west of the primary dining area is the exhibition kitchen. The exhibition kitchen was a common characteristic of postwar coffee shops, allowing customers to oversee the cleanliness of the restaurant's food preparation. The exposed kitchen features appliances, preparation counters, shelving, and cabinetry composed of stainless steel (the red cabinets, which match those in the service stations, appear to be replacements). A plaster canopy with canted edges and featuring keystone-shaped light sconces hovers over the exhibition kitchen. The kitchen is bordered on the east side by low counter seating with swivel chairs. Based on visual inspection during a site visit, the dining counter may have been replaced or moved slightly further east, presumably to meet accessibility code requirements for the exhibition kitchen. The counter tops were replaced in the last two to three years.

The back-of-house kitchen, located west of the exhibition kitchen, is a large, primarily open space with smaller rooms along the perimeter. The kitchen retains a plaster ceiling, quarry tile flooring, and tile wall finishes. Stainless steel counters and equipment are strategically spaced throughout to allow for foot traffic and employees cooking.

To the south of the kitchen is an employee breakroom and cashier's station. The rooms feature plaster ceilings and walls and concrete and tile flooring. To north of the kitchen are two restrooms that contain no historic finishes or fixtures.

Take-Out Space

The take-out space has a separate entrance at the west end of the north façade. The interior of the space consists of a small waiting area and an ordering/service counter (front-of-house), and a kitchen/storage area (back-of-house). The waiting area has a wood ceiling supported by exposed wood beams. A dropped ceiling with can lighting delineates the ordering/service area. The walls of the front-of-house space are clad in white, gray, and red tile, which does not appear to be historic, and the floors have non-historic vinyl tile flooring. The take-out kitchen was not accessed during the site visit.

Industrial/Mixed-Use Building (6511-6519 S. Sepulveda Boulevard/6508-6520 S. Arizona Avenue)

Constructed in 1967, the multi-tenant industrial/mixed-use building (6511-6519 S. Sepulveda Boulevard/ 6508-6520 S. Arizona Avenue) is one story in height and L-shaped in plan. It is capped with a flat roof, and its exterior walls are clad in brick. Its west façade, which fronts on Arizona Avenue, is lined with recessed entrances containing non-original fully glazed doors, some with metal security doors. Between the entrances are fixed and sliding aluminum windows. The building's south façade is similarly lined with primarily recessed entries with non-original doors and fixed and sliding aluminum windows. The east end of the south façade has been painted, and an opening appears to have been infilled where a painted mural is installed. The north façade is articulated with large rectangular openings enclosed with metal roll-up doors and multiple pedestrian entrances holding slab doors. The east façade appears to have been significantly altered with new window and door openings to accommodate a restaurant storefront, likely in the 1990s. An entrance ramp, added for accessibility, leads to a fully glazed entrance door at the north half of the façade. Large, fixed windows are located on either side of the entrance. A wood fence and shade structures have been added for temporary outdoor dining during the COVID-19 pandemic.

Chronology of Development and Use

Below is a chronology of development and use of Dinah's Family Restaurant and the industrial/mixed-use building. Source materials include online building permits from the City of Los Angeles Department of Building and Safety, *Los Angeles Times* newspaper articles, historic aerial photographs, and contemporary social media posts.

Dinah's Family Restaurant (6521 S. Sepulveda Boulevard)

Dec. 1956: Foundation laid for restaurant and store at 6521-27 Sepulveda Boulevard.

- 1957: Permit pulled for a new building – wood frame and stucco restaurant and store with composite roof. Jacob Tracht is listed as the architect. Owners are listed as Howard Fox and Harry Quinn.
- Rounded canopy on northeast part of building erected, along with roof sign for Henn’s Restaurant.
- Certificate of Occupancy issued to Henn’s Restaurant.
- 1959: Permit issued for conversion of liquor store attached to the restaurant into a banquet room in May.
- The restaurant was rebranded, and Dinah’s Pancake House opens in July.
- Permit issued for a one-story wood frame and stucco addition along west end of building (the current take-out space) in September.
- “Bucket” pole sign was erected on the site in October.
- 1960s: By the mid-1960s, the owners are listed as Fred Humphreys and Roy Roberts. Humphreys owned other restaurants in the Los Angeles area, including Viva Mexican in Burbank.
- 1971: Pylon sign was added in front of the primary entrance along Sepulveda Boulevard.
- 1974: Permit pulled for a small rear southwest addition for a walk-in refrigerator.
- 1976: The primary entrance was remodeled and expanded. New space was enclosed in projecting mirrored glass wall left of the primary entrance.
- Early 1980s: The restaurant’s name is changed from “Dinah’s Pancake House” to “Dinah’s Family Restaurant.”
- 1983: The “Dinah’s Fried Chicken” pylon sign (original build date unknown) was relocated to its current site at the intersection of Arizona and Centinela avenues.
- 1989-95: The orange and yellow color palette, which may have been original and was featured in ceiling finishes and the dining booths, was replaced with the current red and blue scheme.
- 1993: Permit issued for the removal of all roofs, replacement with firestone roofing.

By 1993, ownership appears to have changed back to the original families. Lorin and Mitchell Flyer, relatives of Howard M. Fox and his wife Evelyn Flyer, are listed as the owners, along with Harry J. Quinn.

- 1996: Permit issued for restroom upgrades for accessibility.
- 2004: Permit issued for the replacement of fire-damaged roof rafter: “No structural changes.”
- 2013: The original “bucket” sign in front of the take-out space is replaced with an updated version. Teri and Mario Ernst are the owners until at least 2017. Online news articles indicate the Ernsts are related to the original owners, though it is unknown who their exact relatives are.
- 2018-19: Interior features and finishes, including faux marble cladding, new vinyl tile flooring, carpet, new service station cabinets/storage, and new tabletops replaced original features/finishes. Around the same time, decorative period knick-knacks along the walls removed.
- 2020: Temporary outdoor dining areas added to the north and east sides of the building, obscuring views of the north and east façades.

In addition to the alterations listed above, alterations to the exterior and interior of the building that were not documented in building permits or other source materials were noted. These alterations were identified by visual inspection of the property on August 24, 2020. In the absence of building permits, it is not known when these alterations occurred. The following is a list of the alterations noted during visual inspection:

- New aluminum windows and entrance doors appear to have replaced original windows/doors, which would have likely had narrower frames.
- The dining counter surrounding the exhibition kitchen appears to have been replaced/relocated slightly further east to accommodate a larger kitchen space.

Industrial/Mixed-Use Building (6511-6519 S. Sepulveda Blvd./6508-6520 S. Arizona Ave.)

- 1967: A one-story, multi-tenant industrial/mixed-use building was constructed northeast of the existing Dinah’s Family Restaurant.
- Permit issued for a neon sign for Dobby’s Sportswear retail store at 6519 S. Sepulveda Boulevard, near the east end of the building.
- 1968: Newspapers advertised a “New brick, beaut. ofc.,” 2,000 square feet in size, at 6508 S. Arizona Avenue.

Artex Hobby Products, Inc., a company producing hobby embroidery paints, began occupying 5,000 square feet of office and warehouse space at 6520 S. Arizona Avenue.

1970: Permit issued for the addition of interior partitions at 6520 S. Arizona Avenue. The building's use is listed as office/storage. The owner of the building is listed as Harry J. Quinn, who also owned Dinah's.

The Shady Lady, a lamp store, occupied 6515 S. Sepulveda Boulevard.

1973: A silver ingots store operated out of 6520 S. Arizona Avenue.

1977: A mattress factory showroom occupied 6520 S. Arizona Avenue.

1981: A marketing company called Rumours Ltd. occupied 6508 S. Arizona Avenue.

1987: A satellite store occupied 6515 S. Sepulveda Boulevard.

1988: A mattress factory operated out of 6519 S. Sepulveda Boulevard

1990: Permit issued to change a repair shop into a church meeting space at 6519 ½ Sepulveda Boulevard. Alterations included new interior partitions and accessible restrooms.

1992: Permit issued to change a retail store into a restaurant at 6515 S. Sepulveda Boulevard. Alterations included tenant improvements. This may have been when the fenestration was altered and new window openings added at the east façade of the building.

1994: Permit issued to change an office/warehouse into a commercial kitchen at 6517 ½ S. Sepulveda Boulevard. Work included remodeling the existing space for catering.

2018: A plumbing permit listed Lorin Flyer, who also owned Dinah's, as the owner of 6515 S. Sepulveda Boulevard.

2020: A temporary outdoor dining area was added to the east side of the building, obscuring views of the east façade.

In addition to the above, changes to the exterior of the building that were not documented in building permits or other source materials have occurred. In the absence of building permits, it is not possible to determine when these alterations occurred. Below is a list of the changes noted by during visual inspection:

- Most doors replaced

- Door and window security bars added
- Signage added/replaced

Historical Background and Context

Postwar Commercial Development of Westchester

The planned suburb of Westchester, subdivided from 1940-1944, was among the first developments of its kind in America to be conceived not as an dependent bedroom community, but as a self-sufficient neighborhood, with places to live, work, shop, and eat. The ground for the development was laid as early as 1928, when the City of Los Angeles chose to site its municipal airport (eventually, LAX) in the southwestern Ballona wetlands. Thereafter, aviation- related industries became the economic linchpin of the surrounding region. With the start of World War II, aircraft manufacturing plants, including North American Aviation and Douglas Aircraft arose nearby, and earlier plants such as Hughes Aircraft Company facilities (established in the 1930s) expanded, attracting droves of commuting defense workers. Westchester, which included tracts by Marlow-Burns and Frank H. Ayres & Sons, was planned as a subdivision of 3,230 residences to house these workers. Residency was initially restricted to those engaged in the war effort.

The aviation and aerospace industries proliferated in Westchester after World War II, as companies shifted their focus to manufacturing commercial passenger planes. Most postwar industrial development occurred around LAX and other previously established industrial districts. In the late 1950s through the early 1970s, developer Robert G. Harris subdivided and developed the Westchester Industrial Tract (to the west of the Project Site), less than one-half mile from the Hughes Aircraft plant. The tract comprised several low-scale brick buildings that were leased to industrial manufacturers, the majority of whom produced parts and materials for aviation-related industries.

An integral component of Westchester's master plan was the construction of a low-scale commercial district to serve its residents. Now known as the Westchester Triangle, the commercial development is located to the east of Sepulveda and south of Manchester Avenue, in the southern section of the community. Construction of the district commenced shortly after the war and continued into the early 1960s. After the war, Westchester continued to expand towards neighboring Playa del Rey, where Kaiser Community Homes, an offshoot of the wartime shipbuilding company, built a massive factory for pre-assembled housing components. Kaiser Community Homes' new housing project was funded by the Federal Housing Administration (FHA). As with many areas across the country, the company had in place racially restrictive housing policies, precluding Black families and other people of color from residing in Westchester's new residential neighborhoods.

Commercial infrastructure followed the expansion of industrial and residential development, with the rise of new auto-oriented retail corridors to the north and west of

the residential neighborhoods along Centinela Avenue and Jefferson Boulevard in the late 1950s and early '60s. Dinah's Family Restaurant (building 1957 as Henn's Restaurant), located at the intersection of Sepulveda Boulevard and Centinela Avenue, along with nearby Pann's Coffee Shop (1958), and the original Denny's (1959) became local hubs, serving as locations for community meetings and offering inexpensive traditional American fare to local residents, commuters, and tourists alike.

With the construction of the first leg of the Interstate 405 Freeway in 1961, the expanding northern commercial center of Westchester became inextricably linked to the rest of Los Angeles. This trend culminated in the 2000s, when the mixed-use Playa Vista project development to the northeast attracted a wave of new business and retail presence to the region. Anchored between the nation's second-busiest airport to the south and the emerging technological hub of "Silicon Beach" to the west, Westchester remains a prominent center of industry and commerce to this day.

Dinah's Chicken

Dinah's Chicken was a restaurant franchise that expanded in the late 1950s through the 1970s throughout the Western United States and Canada. Dinah's arose as a competitor to Colonel Harland Sanders' Kentucky Fried Chicken franchise, which expanded nationwide in the mid-1950s, seeking to secure a part of the burgeoning hamburger-centric postwar fast food market. Dinah's borrowed tactics from Sanders' restaurant chain, including granting franchise owners rights to a secret recipe for pressure-cooker fried chicken, and associating itself nostalgically with the Old South. Though restaurant reviews of Dinah's Family Restaurant would speculate about the presence of the eponymous figurehead, "Dinah," unlike Colonel Sanders, Dinah was a fiction. Dinah was a racialized caricature of a Southern Black "Mammy" figure whose likeness appeared in advertisements for the franchise in the early 1960s. Like Aunt Jemima, the mascot of the popular pancake syrup brand, a "Dinah" or "Aunt Dinah" had been used to promote molasses and fried chicken even before the Dinah's Chicken brand came into existence. Appealing to the wave of Southern and Eastern transplants who arrived in Southern California following World War II, Dinah's sought to strike a chord of familiarity and home-style authenticity, albeit in a racially exploitative manner. Though Dinah's restaurants were family-owned, with the franchise advertising directly to married couples, none of the Dinah's franchises in Southern California appear to have been Black-owned businesses.

Restaurants in the Dinah's franchise were a loosely cohesive entity that operated under various names, with only some using the brand's logo. Owners primarily bought into the franchise to have access to the fried chicken recipe. During the 1960s and '70s, for instance, in the greater Los Angeles area both a taco stand, Taco Tia in Pasadena, and a traditional sit-down restaurant, the Grist Mill in Burbank, sold Dinah's Chicken under their own auspices. The Dinah's Family Restaurant on Sepulveda Boulevard, opened in 1959 by Howard Fox and Harry Quinn, was the first franchise location in Los Angeles. Alongside the Dinah's fried chicken recipe (initially claimed to be identical to Colonel

Sanders' own), the restaurant also touted its affiliation with the Original Pancake House franchise. This gave the Westchester location a unique identity as “pancake and chicken house,” boasting an expansive, versatile menu in the California coffee shop manner that became popular in postwar Los Angeles.

A Huntington Park location at 2054 E Gage Street opened around the same time as the Westchester location; the two were listed in a 1961 advertisement, though it is unknown if this other branch was also operated by Fox and Quinn. Locations in Glendale, at 4106 San Fernando Road; Hollywood, at 1552 N. Western Avenue; and Long Beach, at the intersection of Atlantic Avenue and San Antonio Drive, opened in 1967, 1969, and 1974, respectively. Of all the former Dinah's locations nationally, only the Dinah's Family Restaurant in Westchester and Dinah's Fried Chicken in Glendale, which appears to have high integrity, are extant. Although both claim to use exclusive fried chicken recipes and retain the same mid-century Dinah's logo, the two restaurants have no affiliation.

Since its founding in 1959, the Westchester Dinah's has become an iconic commercial entity, with strong ties to the surrounding community. Its quality comfort food and homey atmosphere have been the subject of amateur bloggers and professional food critics for decades. In addition to being the go-to breakfast joint for numerous local residents and out-of-towners traveling to and from LAX, Dinah's has served as the meeting hub for local community organizations, such as the Westchester Toastmasters Club, the Westchester YW Wives Club, and the Culver City Community Coordinating Council, as well as the location of myriad events, including the Hughes Employees Assoc. Sports Car Club (HEASCC) “Crazy Maze I” car rally pit stop, health insurance workshops and seminars, and club anniversary parties and social gatherings. In more recent years, it has proved to be one of Hollywood's favorite filming locations, serving as the backdrop for movies and television shows like *The Big Lebowski* (1998), *The Limey* (1999), *Nightcrawler* (2014), *Modern Family* (2015), *Agents of Shield* (2015), and *California Dreaming* (2016).

Googie Architecture

An architectural expression of a prosperous and optimistic postwar America, the hyper-stylized Googie idiom (referred elsewhere in the United States as “Doo-Wop” or “Populuxe”), flourished in Southern California from the late 1940s to the '60s. Identifiable by its Space Age vocabulary of saucers, butterfly roofs, and parabolas; its embrace of modern materials such as stainless steel, Formica, and plastics; and its expressive graphic signage, the style proliferated in the architecture of coffee shops, bowling alleys, car washes, and drive-in theaters. Googie was as much a product of automobile culture as a symbol of it. The style was a direct successor of the roadside mimetic architecture of the 1920s and '30s, which used playful, large-scale forms to attract the attention of vehicular traffic. Googie was also derived from the sleek lines and polished chrome of Streamline Moderne's machine aesthetic – which echoed ocean liners and automobiles – updating the style for the Atomic Age, with rocket-ship finials and shiny plastics. As higher standards of living boosted car ownership, and new freeways allowed Angelenos

to travel with more efficiency than ever, Googie architecture conveyed a buoyant technological optimism.

The paragon of Googie architecture was the California coffee shop, a new restaurant type that offered affordable, family-friendly dining in a stylishly modernistic setting. Architectural historian and author Alan Hess credits the architect John Lautner, a student of Frank Lloyd Wright, with inventing the Googie style with his two locations of the chain Coffee Dan (neither extant), designed in collaboration with Douglas Honnold in the early 1940s. The Vine Street location of Coffee Dan exhibited what would become leitmotifs of the Googie style: a tilted, cantilevered roof and a floor-to-ceiling glass façade that eluded the distinction between inside and out. The idiom's very name was derived from one of Lautner's projects, Googie's, a coffee shop on Sunset and Crescent Heights boulevards that Hess invokes as a series of jutting, oblique planes, topped by a red-painted "roofline propped up on rectangular fins set at an angle and cut back at the top, so that they only barely touched the roof." Frank Lloyd Wright's organic architecture, transmitted directly through former students such as Lautner and Harry Harrison, was a crucial influence on the design of the California coffee shop. Craggy rock walls, triangular clerestories, and projecting eaves, pioneered in the design of Taliesin West, Wright's home and school in Arizona, became fixtures of Googie coffee shop architecture from the late 1940s onward.

Googie coffee shops appeared all over Los Angeles during the 1950s, but became endemic along the wide arterial boulevards of West Los Angeles and the San Fernando Valley, areas that were newly populated by postwar subdivisions. The most prolific architects of California coffee shops were Armet and Davis, whose designs for a local coffee shop chain, Norm's (two of their designs are extant, on La Cienega Boulevard in Los Angeles and in Huntington Park), as well as prototypes for Bob's Big Boy and Denny's were exported regionally and nationwide. Locally, establishments such as Romeo's Times Square Coffee Shop (now Johnie's Coffee Shop) in the Miracle Mile district and Dinah's Family Restaurant (built in 1957 as Henn's, Jacob Tracht) and Pann's Coffee Shop in Westchester, defined themselves with progressively more exuberant architecture and flamboyant acrylic plastic and neon signs. At the same time, these Googie coffee shops entwined themselves in the expansive new suburban fabric of Los Angeles. With their jubilant aesthetic and accessible prices, they became neighborhood fixtures.

By the 1970s, Googie architecture had fallen out of fashion, its flashy novelty deemed too flamboyant by an economically and environmentally conscious public. In the following decades, development pressures and evolving preferences in commercial design resulted in the mass demolition of Los Angeles' Googie building stock: over 30 per cent (138) of Googie style commercial buildings (nationwide) identified by Alan Hess in 1984 have been demolished, with only 271 extant today. Despite a revival of interest in the style heralded by postmodern historians and embraced by the general public, Southern California's few extant Googie coffee shops remain vulnerable to demolition.

The character-defining features of the Googie style include the following:

- Horizontal form, almost always one story in height
- Prominent, exaggerated roofs/rooflines taking on a variety of shapes, such as hyperbolic paraboloids, zig-zag folded plates, butterfly roofs, etc.
- Roofs that generally project and float over walls of plate glass
- Combined use of a variety of materials (stucco, wood, lava rock, flagstone/flagcrete, terrazzo, ceramic stile), both synthetic and natural
- Large expansive plate glass windows
- Entry canopies, often cantilevered or suspended
- Exaggerated signs, either on pylons or attached to the roofline
- Extensive landscaping, with integrated planters and exterior lighting
- Use of exaggerated design elements such as boomerang shapes and starbursts

Jacob Tracht, AIA

Jacob Tracht was born in Pittsburgh, Pennsylvania in 1917, the first-born son of Russian-Jewish immigrants who had arrived in the United States seven years prior. Tracht excelled academically, winning a county-wide achievement award as a high school senior, and a four-year honors scholarship to study architecture at the Carnegie Institute of Technology (now Carnegie Mellon University). While still in university, Tracht won a prize for his low-cost housing design in the nationwide Productive Home Architecture Competition, impressing a jury that included Richard Neutra. After graduation, Tracht worked at H.H. Robertson Industrial Building Products in Pittsburgh until he enlisted in the U.S. Army in 1943. Stationed at Fort MacArthur at the end of his service, Tracht met Marcia Starr, a Los Angeles resident, whom he married in 1946. By the following year, the Trachts were living in Inglewood in a newly constructed multi-family residence, possibly of Jacob's own design. He became a member of the American Institute of Architects in 1953.

Tracht's first major Los Angeles commissions were designed in the novel California Googie coffee shop style. The subject building and the White Front Patio Café on 7627 S. Central Avenue in South LA (now demolished), both built in 1957, featured glass and natural stone walls, jauntily expressive roofs and stylized graphics. In the late 1950s and early '60s, Tracht transitioned to the work for which he is now best known, designing residences for luxury modernist developments in Beverly Hills including the Trousdale Estates, Brentwood Estates, and Doheny Park. Tracht's most notable residential projects, including Starview (1959, heavily altered) in the Brentwood Estates and the Grigsby-

Brown Residence (1961) in the Trousdale Estates shared formal qualities with the earlier coffee shop projects, including rock walls and prominent roof overhangs, and a sensuous relationship to California vernacular architecture. Tracht continued to work into the 1960s and '70s, with modernist commercial projects such as the Metropolitan Office building on West 3rd Street (extant) and a showroom for Martin's of London on Melrose Place (extant). His highest profile role was as director of architectural services for the construction of Cedars-Sinai Medical Center from 1968 to 1976. It is unknown when Tracht retired, and he appears to still be living as of October 2021.

Evaluation of Historical Significance

Previous Evaluations and Studies

The two age-eligible buildings on the Project Site—Dinah's Family Restaurant (6521 S. Sepulveda Boulevard) and the industrial/mixed-use building (6511-6519 S. Sepulveda Blvd./6508-6520 S. Arizona Avenue)—are not designated as historical resources under any local, state, or federal registration program. In addition, they are not listed in the California Built Environment Resource Directory (BERD).

Both buildings were identified as potential historic resources in 2013 during the SurveyLA survey of the Westchester-Playa del Rey Community Plan area. The survey found the Dinah's restaurant building was potentially eligible under local Criterion 1 for its association with Dinah's, an iconic long-time restaurant which has been in continuous operation at this location since 1959. It was also determined eligible for listing in the National Register, California Register, and as a Los Angeles HCM under Criteria C/3/3 as an excellent example of Google architecture. The restaurant's three freestanding signs were also identified as contributing to the significance of the building.

The industrial/mixed-use building (6511-6519 S. Sepulveda Boulevard/6508-6520 S. Arizona Avenue) was recorded through the 2013 SurveyLA survey as a potential contributor to the Arizona Circle Industrial Historic District, the boundaries of which are largely confined to the west of the Project Site. Developed between 1959 and 1973, the district encompasses a single 17-acre tract historically known as the Westchester Industrial Tract. The Westchester Industrial Tract was established by developer Robert G. Harris, whose company owned the land and buildings within the tract and leased them to industrial manufacturers such as Hughes Tool Co., Consolidated Controls Corp., Beta Engineering, and Genistron Corp. The majority of original tenants produced parts and materials for the aviation and aerospace industries, from radio frequency interference equipment to aircraft tools and instruments. According to SurveyLA, the district is significant for the following reasons:

The Arizona Circle Industrial Historic District is significant as an excellent example of a mid-century industrial tract in Westchester. Located in proximity to the Hughes manufacturing facilities and airport (now Playa Vista), the tract illustrates the rapid growth of the aviation, aerospace, and general manufacturing industries in this part

of Los Angeles from the 1950s to the 1970s. It is significant for its strong association with these industries, which played a key role in the economic and physical development of Los Angeles at mid-century.

The historic district was determined eligible for listing in the National Register, California Register, and as a Los Angeles HPOZ under Criteria A/1/1.

The commercial strip mall (6501-6505 S. Sepulveda Boulevard/6502-6506 S. Arizona Avenue), located at the north end of the Project Site, has not been designated or identified as eligible for listing under any federal, state, or local registration criteria. The building was not identified during the 2013 SurveyLA survey of the Westchester-Playa del Rey Community Plan area, and it is not listed in the BERD.

South Central Coastal Information Center Records Search

The South Central Coastal Information Center (SCCIC) conducted a records search in October 2020 for the Project Site and a half-mile radius around the site. The search did not identify any known prehistoric or historic resources on the Project Site. Three prehistoric resources, five historic resources, and one site containing prehistoric and historic resources were identified within a half-mile radius of the Site. Four of the historic resources comprise the Hughes Industrial Historic District, which was determined eligible for listing in the National Register through Section 106 (assigned California Historical Resource Status Code 2S2). The district and its buildings are located at the west edge of the records search radius, more than a quarter of a mile from the Project Site. A fifth historic resource, assigned the Historic Resource Attribute Code AH5 (well/cistern), was identified in a 2019 survey and is located approximately a quarter of a mile northwest of the Project Site. It is unknown whether the well/cistern was assigned a Historical Resource Status Code, as the survey findings were unpublished. Information regarding the three prehistoric resources and one site with prehistoric and historic resources within the search radius cannot be disclosed due to the sensitive nature of the resources. However, none appear to be within a quarter of a mile of the Project Site.

In addition to the records search conducted by the SCCIC, a search of the BERD for historic resources on and within a half-mile radius of the Project Site was conducted. The resources comprising the Hughes Industrial Historic District were the only resources listed in the BERD that are within a half-mile of the site.

Evaluation of Significance

Dinah's Family Restaurant (6521 S. Sepulveda Boulevard)

Dinah's Family Restaurant appears individually eligible for listing in the California Register and as a Los Angeles Historic-Cultural Monument. Due to alterations, the building does not retain sufficient integrity to be eligible for listing in the National Register. The restaurant does not appear to be a contributor to a potential HPOZ.

The Dinah's Family Restaurant building's period of significance under California Register Criterion 3 has been defined as 1957, the date of its construction.

Below is an evaluation of the restaurant building against federal, state, and local eligibility criteria.

National Register and California Register:

National and California Registers Criteria A/1: associated with events that have made a significant contribution to the broad patterns of history.

Dinah's Family Restaurant is associated with the post-World War II commercial construction boom experienced in Westchester, Los Angeles, and throughout Southern California. Established in the 1940s as a residential community to house wartime workers, Westchester's residential population increased considerably in the years following the war. With the expansion of the area's residential neighborhoods in the 1950s and '60s came the rise of new retail along major thoroughfares such as Centinela Avenue and Sepulveda and Jefferson boulevards, as well as the expansion of the community's original commercial district to the east of Sepulveda Boulevard and south of Manchester Avenue (the Westchester Triangle). Though associated with the postwar commercial growth of Westchester, Dinah's is one of several intact commercial buildings in the area that are extant from this time period; it is not unique in its ability to convey this association.

The building is also associated with Dinah's, a long-time commercial establishment and neighborhood icon in the Westchester community. Known for its quality comfort food and warm atmosphere, Dinah's has served as the meeting place for many local clubs and organizations as well as the backdrop for several Hollywood films and television shows. However, because Dinah's importance stems from its close ties to the immediate surrounding community, the building does not appear to meet significance thresholds for National or California Registers eligibility.

For these reasons, the building is not eligible under Criteria A/1 of the National and California Registers.

National and California Registers Criteria B/2: associated with the lives of persons significant in our past.

The restaurant building was originally owned by Howard M. Fox and Harry Quinn. By the mid-1960s, ownership appears to have changed hands to Roy Roberts and Fred Humphreys, who owned other Los Angeles area restaurants such as Viva Mexican in Burbank. By the 1990s, ownership had changed back to Harry Quinn and relatives of Fox, Lorin and Mitchell Flyer. The most known recent owners were Teri and Mario Ernst, who may also be related to the original owners. The Ernsts have owned other restaurant establishments including Ricardo's El Ranchito in La Habra. Research did not indicate that any of the individuals associated with Dinah's was significant to the history of the city,

state, or region in a way that is directly associated with the restaurant. Therefore, the building is not eligible under Criteria B/2 of the National and California Registers.

National and California Registers Criteria C/3: embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction.

The restaurant building is a good example of the Googie style applied to a restaurant/coffee shop. It retains the distinctive features of the style, including its low-pitched gable roof with upswept prow, its expressive circular dining room volume with wide cantilevered eaves, extensive glazing, and combined stucco and stone accent cladding. For these reasons, the restaurant is eligible for listing under California Register Criterion 3. However, the restaurant building has endured a series of alterations that have diminished its integrity in such a way that it is no longer eligible for the National Register.

The building was designed by architect Jacob Tracht. Tracht was active in Los Angeles and neighboring cities in the late 1950s through the 1970s, primarily designing Mid-Century Modern style residential properties as well as a few commercial buildings. It is unknown when he retired, though he still appears to be living as of October 2021. Research did not indicate that Jacob Tracht rises to the level of a master architect, and thus the building does not appear to be significant as a work of Tracht.

National and California Registers Criteria D/4: has yielded or may likely yield information important in prehistory or history.

An archaeological assessment was not within the scope of the *Historical Resources Assessment*. As such, the restaurant building has not been evaluated for eligibility under Criterion D or 4 of the National or California Registers.

Los Angeles Historic-Cultural Monument:

For the reasons stated above in its evaluation under National and California Registers eligibility criteria, the Dinah's Family Restaurant building appears eligible as a Los Angeles HCM under local Criterion 3. The building also appears eligible under location Criterion 1 for its contributions to the social history of the Westchester community.

Local Criterion 1: Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community.

As stated in its above evaluation under National/California Registers Criteria A/1, the restaurant building is associated with postwar commercial development patterns in Westchester. However, as one of numerous intact commercial properties in Westchester from this period, the building does not singularly convey this association.

Dinah's is locally significant as a long-time restaurant/coffee shop with a strong connection to the community, which has been in continuous operation in this building since 1959. Since its founding at this location, Dinah's has served as the meeting hub for myriad neighborhood groups, including the Westchester Toastmasters Club, the Westchester YW Wives Club, and the Culver City Community Coordinating Council. It has been the site of numerous events and workshops geared towards the local community, such as Medicare seminars, car rally pit stops, and club anniversary parties. More recently, it has served as the backdrop in television shows and movies. Therefore, the restaurant building appears eligible under local Criterion 1.

Local Criterion 2: Is associated with the lives of historic personages important to national, state, or local history.

For the reasons stated in its evaluation under National/California Registers Criteria B/2, the restaurant building does not appear eligible for listing under local Criterion 2. Research did not indicate that any of the individuals associated with Dinah's was significant to the history of the city, state, or region in a way that is directly associated with the restaurant building.

Local Criterion 3: Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

As stated in its assessment under California Register Criterion 3, the building appears eligible as a good example of the Googie style as applied to a restaurant/coffee shop. The building retains all of the essential characteristics of the architectural mode.

Los Angeles HPOZ:

The surrounding neighborhood comprises primarily commercial properties that range widely with regard to age and architectural style. No single development pattern or style is represented. Therefore, the Dinah's Family Restaurant is not a contributor to a potential HPOZ.

In summary, upon documentary research, site analysis, the development of historical background, and evaluations against federal, state, and local eligibility criteria, the *Historical Resources Assessment* found that the Dinah's Family Restaurant building is individually eligible for listing in the California Register and as a Los Angeles HCM. However, it is not individually eligible for listing in the National Register or as a contributor to a potential HPOZ.

Industrial/Mixed-Use Building (6511-6519 S. Sepulveda Boulevard/6508-6520 S. Arizona Avenue)

The industrial/mixed-use building (6511-6519 S. Sepulveda Boulevard/6508-6520 S. Arizona Avenue) is not individually eligible for listing in the National Register, California Register, or as a Los Angeles HCM. Additionally, it does not appear eligible as a contributor to a potential historic district/HPOZ, including the SurveyLA-identified Arizona Circle Industrial Historic District.

Below is an assessment of the building against federal, state, and local registration criteria.

National Register and California Register:

National and California Registers Criteria A/1: associated with events that have made a significant contribution to the broad patterns of history.

Constructed in 1967, the industrial/mixed-use building on the Project Site is generally associated with post-World War II development patterns in the Westchester community. As with much of Southern California, Westchester experienced a tremendous population boom and expansion in building construction after World War II, including the growth of industrial manufacturing districts, particularly those related to the aviation industry. During the 1950s and '60s, wartime industrial developments, such as those around LAX and previously established industrial districts like Hughes Aircraft plant (within a half-mile of the Project Site), continued to expand, and new industrial districts, such as the Westchester Industrial Tract (identified as the Arizona Circle Industrial Historic District in SurveyLA, west of the Project Site) were developed. While constructed for light industrial use, the building at 6511-6519 S. Sepulveda Boulevard/6508-6520 S. Arizona Avenue has primarily been used for commercial purposes, holding myriad retail tenants (sportswear store, lampshade store, mattress showrooms, silver ingot store) since its completion, as well as restaurant-related tenants (catering kitchen, restaurant) and institutional occupants (church meeting spaces) more recently. The building's only apparent industrial use was as storage for a few different manufacturing companies, none of which appears to have been associated with the aviation or aerospace industries.

Thus, while generally associated with the postwar development boom in Westchester, the building is one of numerous commercial/industrial/institutional properties constructed in the area during this time period. Moreover, because the building has been utilized for commercial, and to a lesser extent, industrial purposes over the years, it does not have strong associations with any particular postwar development pattern. For these reasons, the building is not eligible under Criteria A/1 of the National and California Registers.

National California Registers Criteria B/2: associated with the lives of persons significant in our past.

Though an original (1967) construction permit was not found for the building, a 1970 permit indicates an early owner of the building was Harry J. Quinn, who also owned the adjacent Dinah's Family Restaurant. More recently, the building was owned by Lorin Flyer, a relative of Howard Fox, who was the original co-owner of Dinah's with Harry Quinn. The building has been occupied by many tenants over the years, including a sportswear store, the offices and warehouse of a craft paint manufacturer, a lampshade boutique, a silver ingot store, and mattress showrooms. Research did not indicate that any of the individuals associated with the building were significant to the history of the city, state, or region in a way that is directly associated with the building. Therefore, the building is not eligible under Criteria B/2 of the National and California Registers.

National and California Registers Criteria C/3: embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction.

The industrial/mixed-use building was designed in a utilitarian, vernacular aesthetic. One story in height and made of common building materials, such as brick and concrete with aluminum fenestration, the unadorned building does not embody the distinctive characteristics of a type, period, or method of construction, nor does it possess high artistic values. The original builder and architect are unknown. However, given its modest appearance, it does not appear to represent the work of a master. For these reasons, the building is not eligible under Criteria C/3 of the National and California Registers.

National and California Registers Criteria D/4: has yielded or may likely yield information important in prehistory or history.

An archeological assessment was not within the scope of the *Historical Resources Assessment*. As such, the building has not been evaluated for eligibility under Criterion D or 4 of the National or California Registers.

Los Angeles Historic-Cultural Monument:

For the reasons stated above in its evaluation under National and California Registers eligibility criteria, the industrial/mixed-use building at 6511-6519 S. Sepulveda Boulevard/6508-6520 S. Arizona Avenue is not eligible for listing under any Los Angeles HCM criteria.

Local Criterion 1: Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community.

As stated in its above evaluation under National and California Registers Criteria A/1, the industrial/mixed-use building is generally associated with postwar development patterns in Westchester. However, as one of numerous intact properties in the community from this period, the building does not singularly convey this association. Furthermore, while constructed for industrial use, the building has primarily been used for commercial as well as warehouse/storage and institutional purposes and thus, does not bear strong associations with any particular development pattern in Westchester. Thus, the building is not eligible for listing under local Criterion 1.

Local Criterion 2: Is associated with the lives of historic personages important to national, state, or local history.

For the reasons stated in its evaluation under National and California Registers Criteria B/2, the industrial/mixed-use building is not eligible for listing under local Criterion 2. Research did not indicate that any of the owners or tenants associated with the building were significant to the history of the city, state, or region in a way that is directly associated with the building.

Local Criterion 3: Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

As stated in its assessment under National and California Registers Criteria C/3, 6511-6519 S. Sepulveda Boulevard/6508-6520 S. Arizona Avenue is a modest, utilitarian building that does not embody the distinctive characteristics of a style, type, period or method of construction. While the original architect/builder is unknown, given its modest design, it does not appear to represent the work of a master. Thus, the building is not eligible for listing under local Criterion 3.

Historic District/Los Angeles HPOZ:

The industrial/mixed-use building at 6511-6519 S. Sepulveda Boulevard/6508-6520 S. Arizona Avenue was identified through SurveyLA as a contributor to the potential Arizona Circle Industrial Historic District (locally referred to as an HPOZ). Developed between 1959 and 1973, the district encompasses a single 17-acre tract historically known as the Westchester Industrial Tract. Established by developer Robert G. Harris, the majority of original tenants of the tract produced parts and materials for the aviation and aerospace industries

Although the building is directly adjacent to the Westchester Industrial Tract, it does not have any historic associations with the subdivision or the stated reasons for the tract's

significance. The building bears some visual cohesion to the other buildings in the district, including its one-story height, brick cladding, and utilitarian appearance. However, unlike the other contributing buildings within the district, the building at 6511-6519 S. Sepulveda Boulevard/6508-6520 S. Arizona Avenue is located outside of the Westchester Industrial Tract, on the opposite side of Arizona Avenue, and surrounded by commercial properties. It was never advertised as being associated with the industrial subdivision, and may have been originally owned by Harry J. Quinn, who also owned Dinah's Family Restaurant. Thus, it is unlikely the building was originally owned or developed by Robert G. Harris, who owned and constructed the other buildings within the district. Furthermore, the building does not appear to have any historic associations with the aircraft or aerospace industry, and it appears to always have been used for commercial and office/storage functions, rather than manufacturing. It does not appear that any of the tenants were long-term occupants of the building, nor do they appear to have made significant contributions to the commercial and industrial development of Westchester. Current occupants include a restaurant, church, and martial arts center.

For the above stated reasons, 6511-6519 S. Sepulveda Boulevard/6508-6520 S. Arizona Avenue does not appear eligible as a contributor to the potential Arizona Circle Industrial Historic District. It was never historically associated with the Westchester Industrial Tract; it is a geographical outlier to the potential historic district, located across the street from the rest of the tract. Unlike buildings within the historic district, original tenants of 6511-6519 S. Sepulveda Boulevard/6508-6520 S. Arizona Avenue did not include manufacturers tied to the aircraft or aerospace industry. It was likely included in the SurveyLA-identified historic district because of its adjacency and similar appearance to the buildings within the Westchester Industrial Tract. However, extensive supplemental research conducted as part of this analysis provides evidence that it does not bear any historic association with the tract.

In summary, because the industrial/mixed-use building (6511-6519 S. Sepulveda Boulevard/6508-6520 S. Arizona Avenue) is not eligible for federal, state, or local listing, either individually or as a contributor to a historic district/HPOZ, the building does not meet the definition of a historical resource under CEQA.

Evaluation of Integrity

Dinah's Family Restaurant (6521 S. Sepulveda Boulevard)

In order for a property to be eligible for listing in the National and California Registers, it must retain sufficient integrity to convey its historic significance. As previously discussed in its evaluation of significance, the Dinah's Family Restaurant building does not retain sufficient integrity to be eligible for listing in the National Register under any criteria. Per the discussion above, integrity thresholds associated with the California Register are generally less rigid than those associated with the National Register, and it is possible that a resource may lack the integrity necessary for the National Register but still be eligible for listing in the California Register. Similarly, the City of Los Angeles Cultural

Heritage Ordinance does not include language regarding integrity, but in practice, the City considers integrity in determining whether a historic resource qualifies as an HCM and has shown greater flexibility when evaluating integrity for local designation as an HCM than is the case for determining state or federal eligibility. Set forth below is an evaluation of the Dinah's Family Restaurant building under the seven aspects of integrity established as part of the National Register process.

Location is the place where the historic property was constructed or the place where the historic event occurred.

The restaurant building remains on its original site and therefore retains integrity of location.

Design is the combination of elements that create the form, plan, space, structure, and style of a property.

The building has undergone some alterations to its original design, such as the remodeling of the primary entrance to include a floor-to-ceiling mirrored glass entrance volume, the construction of a small rear addition to accommodate a walk-in refrigerator, and replacement of most interior features and finishes. However, many of the building's exterior character-defining features, including its horizontal emphasis; low-pitched gable roof with slightly upswept prow at the east end; northeast circular volume with a flat roof and wide eaves; extensive fixed glazing; combined stucco and stone accent cladding; and pole/pylon signs featuring plastic backlit boxes/lettering are still intact. Additionally, the overall floor plan of the interior, with a central open dining room bounded by a circular dining area to the northeast and an exhibition kitchen to the west, are still present. Because its overall form, massing, and style are intact, the building retains its integrity of design.

Setting is the physical environment of an historic property, constituting topographic features, vegetation, manmade features, and relationships between buildings or open space.

The building's setting has changed since its original construction. A low-scale, 1950s-70s industrial complex and single-family residential suburbs still surround the property to the south and west. However, the land to the east of Sepulveda Boulevard, opposite the restaurant building, was left open and undeveloped until the 1980s and 1990s when a large high-rise mixed-use development known as the Howard Hughes Center was constructed. Additionally, the area immediately to the north of the property was altered with the construction of a one-story commercial strip mall in 1983. Immediately south of the restaurant, a four-story hotel building replaced a smaller commercial building in the 1990s/early 2000s. Due to the significant development immediately adjacent to and surrounding the property, the building no longer retains integrity of setting.

Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form an historic property.

The building has lost original exterior materials such as all its windows and doors and some signage. And, most interior features (light fixtures, counters, tables) and finishes (wall cladding, booth upholstery, restroom finishes) have either been replaced or covered over. Although the building retains some of its original materials (stucco and stone cladding, terrazzo flooring), its integrity of materials has been somewhat diminished due to the alterations listed above.

Workmanship is the physical evidence of the crafts of a particular culture, people, or artisan during any given period in history or pre-history.

Alterations to the building, including the remodeling of the main entrance and the removal of interior features/finishes, have somewhat compromised the physical evidence of its original craftsmanship. However, because the overall design of the building is intact and the property retains some of its original materials (including stucco and stone accent cladding and terrazzo flooring), the building retains its overall integrity of workmanship from its historical period.

Feeling is a property's expression of the aesthetic or historical sense of a particular period of time.

The building's location along a major thoroughfare and design are still intact, and it still retains some of its historic materials and the majority of its features that help to convey its original workmanship. It continues to express the feeling of a 1950s auto-oriented commercial building, and is readily recognizable as a postwar Googie style coffee shop. Thus, it retains this aspect of integrity.

Association is the direct link between an important historic event or person and a historic property.

The building has long been a prominent fixture of the neighborhood, and its Googie design, workmanship, and feeling as a postwar auto-oriented coffee shop are still intact. Furthermore, as the building has been in continuous operation as Dinah's since 1959, it retains its association with the long-time coffee shop.

For these reasons, and based on the greater flexibility for assessing the integrity of a historic resource for local and state designation, as compared to potential listing on the National Register, the building appears to retain sufficient integrity to qualify for potential listing in the California Register and as a Los Angeles HCM.

Industrial/Mixed-Use Building (6511-6519 S. Sepulveda Boulevard/6508-6520 S. Arizona Avenue)

For a property to be eligible for listing in the National and California Registers, or as a Los Angeles HCM, it must first meet one or more eligibility criteria and also retain sufficient integrity to convey its historic significance. As stated in *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, “only after significance is fully established can you proceed to the issue of integrity.” In accordance with best professional practices, it is customary to apply this same methodology when evaluating resources under state and local eligibility criteria. Because the industrial/mixed-use building (6511-6519 S. Sepulveda Boulevard/6508-6520 S. Arizona Avenue) is not eligible under any federal, state, or local registration criteria, the building’s integrity has not been evaluated.

Character-Defining Features

The following is a list of character-defining features for Dinah’s Family Restaurant:

Site

- Prominent street frontage along Sepulveda Boulevard, near the intersection with Centinela Avenue
- Pylon sign (added in 1971) with backlit rectangular sign box topped with a lantern and metal scrolls, near the northeast corner of the building along Sepulveda Boulevard
- Bucket pole sign near the northwest end of the building (added in 1959; bucket replaced in 2013)
- Pole sign with individual dynamic backlit letters spelling out “Dinah’s” at the corner of Arizona and Centinela avenues (moved to this location in 1983; original construction date unknown)

Exterior

- Low, horizontal (one-story) profile
- Rectangular plan
- Low-pitched and flat roofs with slightly upswept prow at the gable end (east half of building)
- Circular volume with a flat roof and wide, cantilevered eaves at the northeast corner of the building

- Stucco cladding with stone accent cladding
- Extensive use of fixed glazing with aluminum frames at the north and east façades
- Projecting stone-clad wingwalls that divide the east façade into bays

Interior

- Large central open dining area
- Circular dining room open to the main dining area at the northeast end
- Exhibition kitchen along the west side of the main dining area
- Dropped trapezoidal-shaped volumes terminating in circular disks at the ceiling
- Stone accent walls to the east of the entrance (behind the cashier's station) and separating booths along the east side of the main dining area
- Terrazzo flooring, visible in areas where not covered in vinyl tile or carpet

Because the industrial/mixed-use building is not eligible for federal, state, or local designation, no character-defining features were identified as part of this analysis.

Impacts Analysis

Summary of Historical Resource Findings

The Project Site comprises three legal parcels (APNs: 4110-001-007, 4110-001-006, 4110-001-024) developed with three primary buildings.

- Dinah's Family Restaurant building (6521 S. Sepulveda Boulevard)
- Industrial/mixed-use building (6511-6519 S. Sepulveda Boulevard/6508-6520 S. Arizona Avenue)
- Commercial strip mall (6501-6505 S. Sepulveda Boulevard/6502-6506 S. Arizona Avenue)

The site also contains paved surface parking lots, four freestanding pole/pylon signs, a billboard, and a small locksmith shop.

Upon documentary research, site analysis, the development of historical background, and an evaluation against federal, state, and local eligibility criteria, one building on the Project Site that meets the definition of a historical resource for the purposes of CEQA (Dinah's Family Restaurant [6521 S. Sepulveda Boulevard]) appears eligible for listing in the

California Register and as a local HCM. There is one adjacent potential historical resource, the Arizona Circle Industrial Historic District, located to the west of the Project Site.

Significance Threshold

According to California CEQA Guidelines, a project has the potential to impact a historical resource when the project involves a “substantial adverse change” in the resource’s significance. Substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.”

The significance of an historical resource is materially impaired when a project would do the following:

- a) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, the California Register of Historical Resources; or
- b) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project by a preponderance of evidence that the resource is not historically or culturally significant; or
- c) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for the purposes of CEQA.

Project Description

The Project includes the demolition and clearing of a one-story, multi-tenant industrial/mixed-use building (6511-6519 S. Sepulveda Boulevard/6508-6520 S. Arizona Avenue), a one-story, multi-tenant commercial strip mall (6501-6505 S. Sepulveda Boulevard/6502-6506 S. Arizona Avenue), and all associated surface parking lots, and the construction of a new mixed-use development.

The Project would retain the majority of the Dinah’s Family Restaurant building, including nearly all of its character-defining features and materials described previously. The building would continue to house a restaurant program, and previous alterations, including non-historic blue awnings on the east façade, would be removed. New

mechanical, electrical, and plumbing (MEP) systems would be installed in order to minimize the need for obtrusive rooftop equipment.

A small portion at the rear of the restaurant building (comprising the take-out department, which was added in 1959 and is not character-defining) would be removed to make way for the integration of the mixed-use development. New structural columns would also be installed in the west half of the building, which consists of back-of-house space, to support the section of the new mixed-use building that cantilevers over the back portion of the restaurant.

The restaurant's pylon sign nearest the building, at the northeast corner along Sepulveda Boulevard (added 1971), would be retained in place. Due to their locations on the Project Site, the other two Dinah's signs cannot be retained in their current locations. The bucket sign near the northwest end of the restaurant building would be relocated and incorporated into the Project in a different location on site. The pole sign at the corner of Arizona Avenue and Centinela Avenue would be removed and either stored or donated to a local sign museum. One other freestanding sign, a billboard, and a locksmith shop, none of which are associated with the restaurant or have any historical significance, would be demolished.

The Project includes the construction of an eight-story, 362-unit multi-family residential building with approximately 3,700 square-feet of ground-floor restaurant space fronting Sepulveda Boulevard (in addition to the existing Dinah's restaurant). Forty-one of the multi-family residential dwelling units are proposed to be restricted to Very Low Income households. The proposed building would be approximately 365,623 square-feet in size with a floor area ratio (FAR) of 3.85:1 (including the Dinah's Family Restaurant building). The primary building entrance would be located along Sepulveda Boulevard, and ground-floor retail tenant spaces would have individual entrances from both the sidewalk and the interior parking garage. Residential amenities include a dog care center on the ground floor, an open-air landscaped courtyard with swimming pool at the fourth floor, a fitness center at the fourth floor, recreation rooms at both the fourth and eighth floors, and a roof deck.

The Project would provide 520 automobile parking spaces (including 7 replacement parking spaces for the restaurant building) in one subterranean level, one at-grade level, and two above-grade levels, in addition to 214 short and long term bicycle parking spaces. Vehicular ingress and egress to the garage would be provided by two existing two-way driveway cuts, one on Sepulveda Boulevard and one on Arizona Avenue. The existing northern driveway cut on Arizona Avenue is proposed to be closed.

Analysis of Project Impacts

Historical Resources on the Project Site

As noted above, a project has the potential to impact a historical resource if the project would result in a “substantial adverse change” to the significance of a historical resource. In general, substantial adverse change is defined as demolition or material alteration in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, the California Register.

As discussed above, the Dinah’s Family Restaurant building was found to be eligible for the California Register and as a Los Angeles HCM and thus meets the definition of a historical resource for the purposes of CEQA. No other buildings or improvements on the Project Site are historical resources under CEQA.

The Project would not demolish the Dinah’s Family Restaurant building. Although the Project would result in some alterations to the historic building and site, the building would continue to retain all but one of its character-defining features, as follows:

- Prominent street frontage along Sepulveda Boulevard, near the intersection with Centinela Avenue
- Pylon sign with backlit rectangular sign box topped with a lantern and metal scrolls, near the northeast corner of the building along Sepulveda Boulevard
- Bucket pole sign near the northwest end of the building (although it would be relocated to another location on the site)
- Low, horizontal (one-story) profile
- Rectangular plan
- Low-pitched and flat roofs with slightly upswept prow at the (east) gable end
- Circular volume with a flat roof and wide, cantilevered eaves at the northeast corner of the building
- Stucco cladding with stone accent cladding
- Extensive use of fixed glazing with aluminum frames at the north and east façades
- Projecting stone-clad fins/wingwalls that divide the east façade into bays
- Large central open dining area

- Circular dining room open to the main dining area at the northeast end
- Exhibition kitchen along the west side of the main dining area
- Dropped trapezoidal-shaped volumes terminating in circular disks at the ceiling
- Stone accent walls to the east of the entrance (behind the cashier's station) and separating booths along the east side of the main dining area
- Terrazzo flooring, visible in areas where not covered in vinyl tile or carpet

The following one character-defining feature of the building would not be retained as part of the Project:

- Pole sign with individual dynamic backlit letters spelling out “Dinah’s” at the corner of Arizona Avenue and Centinela Avenue

This pole sign would be removed and either stored in a secure location or donated to a local sign museum.

The Project would retain the historical resource's prominent street frontage along Sepulveda Boulevard. Even though the new mixed-use development would be located directly next to the historical building, the siting of the development and recess of its driveway would ensure that the Dinah's building and its Sepulveda-fronting pylon sign would continue to have good visibility to pedestrian and auto traffic.

The Project would retain the majority of the building. While a small portion at the rear of the building would be demolished, its exterior character-defining features, outlined above, would be preserved. The building would continue to house a restaurant program under the Project. Although the west interior space would be altered with the installation of columns to support the cantilevered section of the new construction, no distinctive characteristics exist in this portion of the building. The Project would retain all of the building's interior character-defining features, listed above.

Although two of the site's character-defining signs would be affected by the Project (i.e., one would be relocated and one would be removed), these signs are not essential to the building's ability to convey its significance. The sign that is most prominently associated with the Dinah's building itself, located directly in front of the building and facing Sepulveda Boulevard, would remain in place. This would maintain the Google-era characteristic of a prominent sign integrated into or located directly adjacent to the building it is promoting. Although the bucket sign would be moved from its current location to another location within the development Project, the sign would remain onsite and would continue to convey its association with the Dinah's restaurant. The “Dinah's Fried Chicken” sign located at the corner of Sepulveda Boulevard and Centinela Avenue is not located near or even within view of the Dinah's restaurant building, and it was placed in

this location in 1983. Its removal would not have an impact on the historical resource’s ability to convey its significance, which is predominantly conveyed by the features of the building itself and its immediate site. (The treatment of the two signs to either be relocated or removed is outlined as Project Design Features [PDFs], described at the end of the analysis of the Project’s impacts on historic resources.)

Because the Project preserves all the physical characteristics of the restaurant that convey its historical significance and eligibility for listing in the California Register and as a Los Angeles HCM, the Project would not result in a substantial adverse change in the historical significance of the resource.

Below is an evaluation of the integrity of Dinah’s Family Restaurant based on the planned condition of the building upon Project completion. The building currently retains sufficient integrity to convey its significance and eligibility for California Register and local listing. The purpose of this evaluation is to examine whether, upon completion of the Project, the building would continue to retain sufficient integrity to be eligible for listing in the California Register and as a Los Angeles HCM, such that its significance would not be materially impaired. The building’s current integrity and anticipated integrity following Project completion are provided below for a side-by-side for comparison.

<i>Location</i> is the place where the historic property was constructed or the place where the historic event occurred.	
Current	Anticipated
The building retains integrity of location.	The restaurant building would remain on its original site on the west side of Sepulveda Boulevard, near the intersection with Centinela Avenue, and therefore it would retain integrity of location under the Project.
<i>Design</i> is the combination of elements that create the form, plan, space, structure, and style of a property.	
Current	Anticipated
Although the building has undergone some alterations to its original design (remodeling of the primary entrance, construction of small side and rear additions, and replacement of most interior features/finishes), many of the building’s exterior character-defining features, in addition to its overall form, massing, and style, are still intact. Thus, the building retains integrity of design.	The Project would result in some changes to the restaurant building’s design. A portion at the rear of the restaurant, comprising the take-out department, would be demolished under the Project, and the upper stories of the new mixed-use building would cantilever above the remaining west half of the restaurant. New structural columns would also be installed in the west half of the building (back-of-house space), which would result in modifications to the interior of

	<p>the space and removal of interior features/finishes.</p> <p>However, the take-out space was added in 1959 and is not a character-defining feature of the building's design. Similarly, the west half of the building that would remain, but that would be partially obscured from street view and altered by the cantilevered portion of the new construction, contains utilitarian spaces that do not hold any distinctive characteristics of the restaurant.</p> <p>Two of the three freestanding signs that currently exist on the site would be removed and either relocated on-site or off-site. The sign most visually associated with the design of Dinah's (located directly adjacent to and in front of the building) would remain in place. The other two signs are less visually prominent due to their locations on site. Their removal would not have an impact on the building's form, plan, space, structure, or style.</p> <p>For these reasons, the restaurant will retain its integrity of design following Project completion.</p>
<p>Setting is the physical environment of an historic property, constituting topographic features, vegetation, manmade features, and relationships between buildings or open space.</p>	
<p>Current</p>	<p>Anticipated</p>
<p>Due to changes in setting immediately surrounding the property, including the addition of buildings of significant height across the street in the 1980s/90s, the restaurant building no longer retains integrity of setting.</p>	<p>The Project would result in additional changes to the building's current setting. The Project includes construction of an eight-story, mixed-use building immediately adjacent to and cantilevering over the restaurant. However, the new construction would be set back from Sepulveda Boulevard by approximately 15 feet, so that historical views of the restaurant's</p>

	<p>primary (east) façade would still be visible from the north and the south along Sepulveda, and its historic relationship with the boulevard would be retained. Furthermore, the restaurant is currently surrounded by much larger contemporary buildings along the east side of Sepulveda, as well as smaller non-historic development to the north and south. For these reasons, the construction of the new mixed-use building on the Site would not further materially diminish the building’s integrity of setting.</p>
<p>Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form an historic property.</p>	
<p>Current</p>	<p>Anticipated</p>
<p>The building has lost original exterior materials such as all of its windows and doors and some signage. And, most interior features and finishes have either been replaced or covered over. Although the building retains some of its original materials (stucco and stone cladding, terrazzo flooring), its integrity of materials has been somewhat diminished due to the alterations listed above.</p>	<p>The Project would result in some modifications to the building’s materials through the removal of the take-out space on the west end and the construction of structural columns inside the west-end back-of-house space to support the cantilevered portion of the new building. However, as previously stated in its assessment of design integrity, none of the materials that would be removed under the Project are distinctive or character-defining of the building. Therefore, although some materials would be lost, the restaurant’s distinctive materials would be retained, and the Project would not further materially diminish the building’s integrity of materials.</p>
<p>Workmanship is the physical evidence of the crafts of a particular culture, people, or artisan during any given period in history or pre-history.</p>	
<p>Current</p>	<p>Anticipated</p>
<p>Alterations to the building, including the remodeling of the main entrance and the removal of interior features/finishes, have somewhat compromised the physical evidence of its original craftsmanship. However,</p>	<p>The building’s extant character-defining features and materials that represent the physical evidence of its original craftsmanship (stucco and stone cladding, terrazzo flooring) would be retained under the Project.</p>

because the overall design of the building is intact and the property retains some of its original materials (including stucco and stone accent cladding and terrazzo flooring), the building retains its overall integrity of workmanship.	Therefore, the building would retain its integrity of workmanship under the Project.
<i>Feeling is a property's expression of the aesthetic or historical sense of a particular period of time.</i>	
Current	Anticipated
The building's location along a major thoroughfare and design are still intact, and it still retains some of its historic materials and the majority of its features that help to convey its original workmanship. It continues to evoke the feeling of a 1950s auto-oriented commercial building, and is readily recognizable as a postwar Google style coffee shop. Thus, its integrity of feeling is intact.	The Project would not further materially compromise the building's current integrity of setting, and its location, design, workmanship, and nearly all extant character-defining features and materials would be retained. Therefore, the restaurant would continue to evoke the aesthetic and historic sense of its period that it does currently, and its integrity of feeling would be retained under the Project.
<i>Association is the direct link between an important historic event or person and a historic property.</i>	
Current	Anticipated
The building has long been a prominent fixture of the neighborhood, and its Google design, workmanship, and feeling are still intact. Furthermore, as the building has been in continuous operation as Dinah's since 1959, it retains its association with the long-time coffee shop.	Because the building would continue to be available for use as a restaurant, and because nearly all of the building's character-defining features would be preserved, the building's integrity of association would be retained under the Project.

Based on a review of all Project plans and other documents, the Project would not significantly impact the restaurant building's integrity of location, design, workmanship, feeling, and association, and it would not further materially compromise the building's integrity of setting and materials, which have previously been diminished due to prior alterations. Thus, development of the Project would not materially impair Dinah's Family Restaurant, because it would retain sufficient integrity to convey its historic significance and would remain eligible for listing in the California Register and designation as a Los Angeles HCM. Therefore, Project impacts related to on-site historical resources would be less than significant.

Summary of Continued Eligibility

The Dinah's Family Restaurant building currently retains sufficient integrity to be eligible for listing in the California Register and as a Los Angeles HCM under Criteria 3/3 for embodying the distinctive characteristics of the Googie style. It is also eligible for designation as a Los Angeles HCM under Criterion 1 for its contributions to the social history of the Westchester community.

This analysis considered the Project's potential impact on historical resources, which will involve: (1) the demolition of two non-historic buildings, non-historic signs, non-historic locksmith shop, and parking lots on the Site; (2) the retention of Dinah's Family Restaurant for continued use as a restaurant; and (3) the construction of a new eight-story mixed-use building and parking structure. The restaurant building has been determined eligible under California Register/Los Angeles HCM Criteria 3/3 for its physical qualities related to its architectural design as well as under Los Angeles HCM Criterion 1 for its contributions to the social history of Westchester. An objective of the Project is to retain the majority of the restaurant building in a manner that would not materially impair the significance of the historical resource.

The Project satisfies this objective because the building would continue to be eligible for listing in the California Register and designation as a Los Angeles HCM. Although some original materials and features would be lost to accommodate the new development, its overall design and nearly all of its extant character-defining features described previously would be retained.

Historical Resources Adjacent to the Project Site

The Project would not have an impact on any historical resources adjacent the Project Site. For purposes of this analysis, "adjacent" is defined as located on any neighboring parcels either next to or across the street from the Project Site.

As discussed previously, a records search of the BERD and through the SCCIC that included a review of all previously recorded cultural resources within a half-mile radius of the Project Site, was conducted. While nine resources were identified within a half-mile of the Project Site, no resources recorded in the BERD are located within a quarter-mile of the site and none in its immediate vicinity.

Also as discussed previously, the Project Site is located adjacent to (west of) the SurveyLA-identified Arizona Circle Industrial Historic District. Sited across Arizona Avenue from the Site and extending to the west, the potential historic district is well contained within its original tract boundaries. The majority of buildings within the district front on Arizona Circle and Arizona Place and do not have any significant viewsheds to or from the east that would be blocked by the Project.

Although the SurveyLA findings extended the boundary into the Project Site to include the multi-tenant industrial/mixed-use building (6511-6519 S. Sepulveda Boulevard/6508-6520 S. Arizona Avenue), supplemental research conducted as part of this analysis confirmed that this building does not bear any direct association with the Westchester Industrial Tract that comprises the historic district. Furthermore, located on the opposite site of Arizona Avenue from the rest of the district's contributors, it is a visual outlier to the historic district.

Although the Project would be larger in scale and different in visual character than the SurveyLA-identified Arizona Circle Industrial Historic District, due to its location across Arizona Avenue and separate from the potential historic district, it will remain visually separate and distinct from the potential historic district, which is oriented away from the Project Site. The potential historic district would continue to convey all of its physical characteristics and overall district setting upon completion of the Project. For these reasons, the Project would not cause an indirect impact on the adjacent potential Arizona Circle Industrial Historic District.

Project Design Features

PDF-1. Oversight of Rehabilitation of Dinah's Building

The rehabilitation of Dinah's Family Restaurant, and the treatment of all of its materials, features, and immediate site, shall be overseen by a Historic Architect meeting the Secretary of the Interior's Professional Qualification Standards in Architecture and/or Historic Architecture.

PDF-2. Treatment of Dinah's Restaurant Signs

a. Bucket Sign

The Dinah's Restaurant bucket sign, located at the rear of the Dinah's building, shall be removed from its current location and relocated within the Project Site. The bucket portion of the sign shall either be preserved and integrated somewhere in the Project's open space areas as an art piece, or the bucket sign or a portion thereof shall be relocated in front of the Dinah's building at the southeast corner of the Project Site.

b. Pylon Sign at the Corner of Sepulveda Boulevard and Centinela Avenue

The Dinah's Fried Chicken sign, located at the corner of Sepulveda Boulevard and Centinela Avenue, shall be removed from its current location and either stored at an appropriate and secure location or donated to a local sign museum.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

Less Than Significant With Mitigation Incorporated. The Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. The SCCIC conducted a records search for the Project Site and a half-mile radius around the Site. The records search was completed in October 2020. The search did not identify any known prehistoric or historic resources on the Project Site. Three prehistoric resources, five historic resources, and one site containing prehistoric and historic resources were identified within a half-mile radius of the Project Site. Given that resources are known to existing in the Project Site area, it is possible that unknown archaeological resources could exist at the Project Site, and the potential exists for the inadvertent discovery of archaeological materials during ground-disturbing activities associated with the construction phase. However, implementation of Mitigation Measure CULT-1 (listed below) would ensure that potential impacts related to unknown archaeological resources would be less than significant.

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

Less Than Significant Impact. The Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. No known human remains exist at the Project Site. In the event that unknown human remains were encountered at the site, the Applicant would be required to comply with the State's Health and Safety Code Section 7050.5, which provides that in the event of discovery or recognition of any human remains at the Project Sites, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Los Angeles County Coroner has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the PRC. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC). Through compliance with existing regulatory standards, Project impacts to human remains would be less than significant.

Mitigation Measures

CULT-1: Inadvertent Discovery of Archaeological Resources

- If any archaeological materials are encountered during the course of Project development, all further development activity in the vicinity of the materials shall halt and:
 - The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact;
 - The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource; and
 - The Project Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report.
- Project development activities may resume once copies of the archaeological survey, study or report are submitted to:

SCCIC Department of Anthropology
McCarthy Hall 477
CSU Fullerton
800 North State College Boulevard
Fullerton, CA 92834
- Prior to the issuance of any building permit, the Project Applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered.
- A covenant and agreement binding the Project Applicant to this condition shall be recorded prior to the issuance of a grading permit.

Cumulative Impacts

As discussed above, the Project would not result in impacts to any significant historical resource. Thus, the Project would not have the potential to contribute toward any significant cumulative impacts related to historical resources. Impacts related to archaeological resources and human remains are site-specific and are assessed on a site-by-site basis. All development that involves ground-disturbing activities is required to implement standard City conditions of approval related to the discovery of

archaeological resources, as well as existing state and City regulations related to discovery of human remains. For these reasons, cumulative impacts related to cultural resources would be less than significant.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Would the project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. This analysis addresses the six criteria outlined in Appendix D of the CEQA Guidelines.

Criterion 1: *The project’s energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.*

Construction

Electricity Demand

Project construction activities would consume relatively minor quantities of electricity to provide temporary power for lighting electronic equipment inside temporary construction trailers and within the proposed structure. This electricity would be supplied to the Project Site by the Los Angeles Department of Water and Power (LADWP) and would be obtained from the existing electrical lines that connect to the Project Site overhead and underground along Sepulveda Boulevard.

Electricity consumed during Project construction would be temporary and would cease upon the completion of construction, as well as vary, depending on site-specific operations and the amount of construction occurring at any given time. Overall, construction activities associated with the Project would require limited electricity supply that would not have an adverse impact on available electricity supplies. Therefore, electricity impacts during construction would be less than significant.

Transportation Energy Demand

As shown on Table VI-1, below, Project construction would consume approximately 146,346 gallons of gasoline and 686,479 gallons of diesel. Project construction is expected to be completed in 2026.

**Table VI-1
Summary of Fuel Use During Project Construction¹**

Fuel Type	Quantity
Gasoline	
On-Road Construction Equipment	146,346 gallons
Off-Road Construction Equipment	0 gallons ²
Total Gasoline	146,346 gallons
Diesel	
On-Road Construction Equipment	647,089 gallons
Off-Road Construction Equipment	39,390 gallons
Total Diesel	686,479 gallons
Total Petroleum-Based Fuel	832,825 gallons
<i>kWh = kilowatt-hours</i>	
¹ Detailed calculations are included in Appendix D.	
² Off-road construction equipment uses diesel fuel.	

Demolition activities are projected to take approximately three months. Heavy-duty construction equipment needed to complete these activities would include diesel-fueled haul trucks, concrete/industrial saw, generator sets, and a rubber tired dozer. The use of haul trucks with double trailers could be used to increase the overall average capacity per trip, which would minimize the total number of trips and fuel required to transport the debris.

Heavy-duty construction equipment needed during construction of the Project would include a cranes, aerial lift, cement and mortar mixer, concrete/industrial saw, generator sets, other material handling equipment, pump, forklift, tractor/loader/backhoe, and welders the majority of which would be diesel fueled. Construction equipment fuels would be provided by local or regional suppliers and vendors.

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. Based on EMFAC data compiled by CARB, the statewide average fuel economy for all vehicle types (automobiles, trucks, and motorcycles) in 2019 was 23.68 miles per gallon (mpg) for gasoline and 9.43 mpg for

diesel.¹⁹ In 2018, California consumed a total of 3.4 billion barrels of gasoline for transportation, which is equivalent to a total annual consumption of 143 billion gallons by the transportation sector.²⁰

Further, while construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and cease upon the completion of construction. Therefore, construction-related impacts to petroleum fuel consumption would be less than significant.

Energy Conservation

The Project would utilize construction contractors who demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h)) to reduce NO_x, PM₁₀, and PM_{2.5} emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023.²¹

In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014, and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets.

Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities.

¹⁹ CARB, <https://arb.ca.gov/emfac/emissions-inventory>.

²⁰ EPA, *State Energy Data System, Table F-3*: http://www.eia.gov/state/seds/sep_fuel/html/pdf/fuel_mg.pdf, August 2021. One barrel of oil has 42 gallons of oil.

²¹ California Air Resources Board, *Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles*, <http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf>.

Operation

Electricity Demand

Currently, LADWP is able to supply over 7,880 megawatts (MW) of generation capacity with the highest recorded peak being 6,502 MW.²² Estimated peak demand in 2023-2024 (shortly before Project buildout timeframe of 2026) is expected to grow to 6,029 MW.²³ Despite these growth projections, demand would still not exceed the existing capacity of 7,880 MW. Thus, there is adequate supply capacity to serve the Project, as it is projected that approximately 2,662,905 kWh/yr of electricity would be used per year at the Project Site (refer to Table VI-2, below). Electrical conduits, wiring, and associated infrastructure would be conveyed to the Project Site from existing LADWP lines that connect to the Project Site overhead and underground on Sepulveda Boulevard.

LADWP has confirmed that existing electrical service is available to the Project Site and would be provided to the Project in accordance with LADWP's rules and regulations.²⁴ LADWP has also confirmed that the Project's estimated electricity requirements are part of the City's total load growth forecast and have been taken into account in the planned growth of the power system.²⁵

**Table VI-2
Estimated Project Electricity Demand**

Land Use	Size	Total (kWh/yr)¹
Residential	362 du	1,387,850
Parking	203,000 sf	1,143,520
Restaurant	3,700 sf ²	131,535
Total		2,662,905
<i>kWh = kilowatt-hours yr = year du = dwelling unit sf =square feet</i>		
¹ <i>Calculated via CalEEMod (refer to Appendix B).</i>		
² <i>The Project also includes preservation and renovation of Dinah's restaurant. However, because Dinah's restaurant is an existing use, its electricity consumption is part of the baseline condition.</i>		

The Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the LADWP and what exists currently at the Project Site for the existing uses. The Project would be in compliance with Title 24 of the CCR

²² LADWP, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=12do6zwhm2_4&_afzLoop=86275907941327.

²³ 2017 Power Strategic Long-Term Resource Plan, December 2017.

²⁴ LADWP, Power System Engineering Division, George Nino, District Engineer, Metro Service Planning, correspondence, January 5, 2021. Refer to Appendix B.

²⁵ *Ibid.*

(CalGreen) requiring building energy efficiency standards and would also be in compliance with the City’s Green Building Code. Electrical service would be provided in accordance with the LADWP’s Rules Governing Water and Electric Service.²⁶ Based on the above analysis, a less than significant impact associated with the consumption of electricity would occur.

Natural Gas Demand

As shown on Table VI-3, below, the Project would consume approximately 4,992,721 cubic feet of natural gas per year. Natural gas is provided to the Project Site by Southern California Gas Company (SoCalGas).²⁷ Natural gas service would be provided in accordance with the SoCalGas’s policies and extension rules on file with the California Public Utilities Commission (CPUC) at the time contractual agreements are made.

The availability of natural gas is based on current conditions of gas supply and regulatory policies. As a public utility, SoCalGas is under the jurisdiction of the CPUC but can also be affected by actions of federal regulatory agencies. Should these agencies take any action that affects gas supply or the conditions under which service is available, gas service would be provided in accordance with those revised conditions.

**Table VI-3
Estimated Project Natural Gas Demand**

Land Use	Size	Total (cf/yr)¹
Residential	362 du	4,036,160
Parking	203,000 sf	0
Restaurant	3,700 sf ²	956,561
Total		4,992,721
<i>cf = cubic feet yr = year sf =square feet</i>		
¹ <i>Calculated via CalEEMod (refer to Appendix B). CalEEMod reports natural gas consumption in 1,000 British thermal units (kBtu). SoCalGas reports natural gas consumption in cubic feet (cf). For comparison purposes, the Project’s natural gas consumption from the CalEEMod results has been converted into cf. One kBtu equals approximately 0.98 cf.</i>		
² <i>The Project also includes preservation and renovation of Dinah’s restaurant. However, because Dinah’s restaurant is an existing use, its electricity consumption is part of the baseline condition.</i>		

²⁶ LADWP Rules Governing Water and Electric Service:
[http://netinfo.ladbs.org/ladbsec.nsf/d3450fd072c7344c882564e5005d0db4/0476e63f972b28e288256b79007c417d/\\$FILE/Rule%2016-d.pdf](http://netinfo.ladbs.org/ladbsec.nsf/d3450fd072c7344c882564e5005d0db4/0476e63f972b28e288256b79007c417d/$FILE/Rule%2016-d.pdf).

²⁷ Southern California Gas Company, Jason Sum, Pipeline Planning Assistant, correspondence, October 22, 2020. Refer to Appendix D.

Gas supply available to SoCalGas from California sources averaged 97 million cubic feet per day (cf/day) in 2019.²⁸ SoCalGas projects total natural gas demand to decrease at an annual rate of 1.0 percent per year through 2035. This decrease is due to modest economic growth, CPUC-mandated energy efficiency standards and programs, tighter standards created by revised Title 24 codes and standards, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). Thus, with natural gas consumption becoming more efficient and decreasing, SoCalGas's projection for natural gas demand also decreases. SoCalGas's storage fields have a combined theoretical storage working inventory capacity of 130 billion cubic feet. The Project would be responsible for paying connection costs to connect its on-site service meters to existing infrastructure. SoCalGas undertakes expansion and/or modification of the natural gas infrastructure to serve future growth within its service area as part of the normal process of providing service.

The Project would be responsible for paying connection costs to connect its on-site service meters to existing infrastructure. SoCalGas undertakes expansion and/or modification of the natural gas infrastructure to serve future growth within its service area as part of the normal process of providing service. There would be no disruption of service to other consumers during the installation of these improvements. The Project would not result in the construction of natural gas facilities (i.e., distribution lines) that would cause significant environmental impacts. As such, a less than significant impact to natural gas infrastructure would occur.

Project operation would result in the irreversible consumption of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. The Project would be in compliance with the City's Green Building Code, which requires building energy efficiency measures. Therefore, Project impacts related to natural gas supply would be less than significant.

Transportation Energy Demand

The Project Site's location takes advantage of existing transportation alternatives in the vicinity that could reduce energy (gasoline, electric, or natural gas, depending on the mode of travel) consumption for transportation needs. The Project Site's location near robust transit opportunities (Metro Local Lines 108 and 110, CCB Lines 2, 3, 6, and CCB Rapid Line 6) would further reduce dependence on automobile travel, reducing the need to own an automobile and consume energy. Additionally, the Project is located a highly urbanized area in the City and would develop 362 multi-family residential units within an HQTAs, as defined by SCAG, and within a TPA as defined by SB 743, and also in close proximity to existing sources of employment and shopping. Specifically, consistent with the land use policies for TPAs, the Project would constitute compact, focused infill development in an established community with access to high-quality transportation.

²⁸ 2020 California Gas Report, California Gas and Electric Utilities, 2019.

Given the urban nature of the Project Site area, Project residents would be able to walk and bike to work and to shop. As such, the Project would reduce vehicle trips and VMT by encouraging walking, bicycling, and other non-automotive forms of transportation, which would result in corresponding reductions in energy demand.

The National Highway Traffic Safety Administration (NHTSA) and CARB have implemented several policies, rules, and regulations, such as Corporate Average Fuel Economy (CAFE) Standards and the Advanced Clean Cars Program, to improve vehicle efficiency, increase the use of alternative fuels, and decrease the reliance on fossil fuels. It is anticipated that the future Project-related and related projects' vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption.

Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. Alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by visitors to the Project Site would reduce the Project's consumption of gasoline and diesel. With compliance with regulatory measures, the Project operations would not result in wasteful, inefficient, and unnecessary consumption of energy.

Criterion 2: *The effects of the project on local and regional energy supplies and on requirements for additional capacity.*

Electricity

The availability of electricity is dependent on adequate generating capacity and adequate fuel supplies. The estimated power requirement for the Project would be part of the total load growth forecast for the City and has been taken into account in the planned growth of the City's power system. The LADWP's load growth forecast incorporates construction activity and is built into the commercial floor space model. In planning sufficient future resources, the LADWP's 2017 Power Strategic Long-Term Resource Plan (2017 SLTRP) incorporates the estimated power requirement for the Project through the load forecast input and has planned sufficient resources to supply the electricity needs. Based on LADWP's 2017 SLTRP, LADWP forecasts that its total energy sales in the 2023-2024 fiscal year (slightly before the Project's buildout year) would be 23,286 gigawatt-hours (GWh) of electricity.²⁹ As discussed previously, the Project would consume approximately 2,662,905 kWh of electricity annually, representing a small fraction of one percent of LADWP's projected sales for that year. As future projected electricity supplies from LADWP are adequate to serve the Project, Project impacts on local and regional electricity supplies would be less than significant.

²⁹ 2017 Power Strategic Long-Term Resource Plan, LADWP, December 2017.

Natural Gas

As stated above, SoCalGas has a combined theoretical storage working inventory capacity of 130 billion cf allocated to residential, small industrial, and commercial customers.³⁰ In 2025 (nearest the Project buildout year of 2026), SoCalGas is anticipated to have a natural gas supply of approximately 3,775 million cf/day. Since the Project is located in an area already served by existing natural gas infrastructure, the Project would not require extensive infrastructure improvement to serve the Project Site. It is not anticipated that any new natural gas distribution pipelines or infrastructure facilities would be constructed or expanded as a result of the Project. However, the Project would require Project-specific infrastructure improvements to connect to the existing infrastructure serving the Project Site area.

As discussed previously, the Project's net natural gas demands are estimated to be approximately 4,992,721 cubic feet per year and would represent a very small fraction of one percent of the SoCalGas's existing natural gas storage capacity. Thus, the Project's estimated natural gas consumption would be within the SoCalGas's existing natural gas storage capacity of 97 billion cubic feet as of 2019. Therefore, Project's impacts on local and regional natural gas supplies would be less than significant.

Criterion 3: The effects of the project on peak and base period demands for electricity and other forms of energy.

As discussed above, the Project's demand for electricity and natural gas supply would be well within the available regional supplies of LADWP and SoCalGas, respectively. The Project's energy demand and consumption would be relatively negligible compared to available supplies. The Project's demand for electricity and natural gas would have a less than significant impact on the peak and base period demands of LADWP and SoCalGas, respectively.

Criterion 4: The degree to which the project complies with existing energy standards.

The proposed Project would be required to comply with Title 24 requirements, CalGreen requirements, and the City's Green Building Code. Additionally, vehicles used by Project residents would be subject to improving fuel-energy standards, including improved engine combustion and the use of electric vehicles. Thus, the Project would comply with energy standards, and impacts would be less than significant.

Criterion 5: The effects of the project on energy resources.

Electricity

LADWP's electricity generation is supplied from a variety of non-renewable and

³⁰ 2020 California Gas Report, California Gas and Electric Utilities, 2019.

renewable sources, such as coal, natural gas, solar, geothermal, wind, and hydropower. Based on LADWP's 2017 SLTRP, LADWP forecasts that its total energy sales in the 2023-2024 fiscal year (slightly before the Project's buildout year) would be 23,086 GWh of electricity. As such, the Project's estimated net annual usage demand of 2,662,905 kWh would be a small fraction of one percent of LADWP's projected sales for the 2023-2024 fiscal year.

In accordance with Senate Bill 350 (SB 350) (Clean Energy and Pollution Reduction Act), which establishes clean energy, clean air, and GHG emissions reduction goals, LADWP is required to procure eligible renewable energy resources of 50 percent by 2030. According to the 2017 SLTRP, LADWP has increased renewable energy percentage from 3 percent to 29 percent from 2003 to 2016. LADWP's future strategy is pursuing higher renewables, energy efficiency, and future electrification of existing fossil fuel processes. It is expected that solar and wind will provide most of the new renewable electric generation in the years ahead.

Overall, the Project would adhere to the required building code standards, such as 2016 Title 24 standards and the City's Green Building Code, to ensure energy efficiency within the Project building. Compliance with energy standards is expected to result in more efficient use of electricity in future years. As such, the Project would not impact electricity resources, and impacts would be less than significant.

Natural Gas

Sources of Southern California's natural gas are primarily obtained from western United States and Canada with a small portion from in-state. As stated, in the 2020 California Gas Report, SoCalGas's storage fields attain a combined theoretical storage working inventory capacity of 1370 billion cf. The Project's demand for natural gas supply is estimated to be approximately 4,992,721 cubic feet per year, which would represent a very small fraction of one percent of the SoCalGas's existing natural gas storage capacity and thus, would be well within the SoCalGas's existing natural gas storage capacity of 97 billion cubic feet as of 2020. Compliance with energy standards is expected to result in more efficient use of natural gas in future years. Therefore, the Project would not impact natural gas resources, and impacts would be less than significant.

Criterion 6: *The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.*

Approximately 25.9 billion gallons were supplied to California refineries in 2019.³¹ Assuming that oil supplies remain constant, the Project's estimated consumption of 146,346 gallons of gasoline and 686,592 gallons of diesel fuel per year (refer to Appendix

³¹ California Energy Commission, *Oil Supply Sources to California Refineries*, <https://www.energy.ca.gov/data-reports/energy-almanac/californias-petroleum-market/oil-supply-sources-california-refineries>, August 2021.

B) would be a small fraction of one percent of total fuel supplies. This estimate is conservative since it is assumed that California's future reliance on oil would be reduced since vehicles are transitioning to alternative fuels, such as electric-fueled vehicles.

Additionally, the Project Site's location takes advantage of existing transportation alternatives in the vicinity that could reduce energy (gasoline, electric, or natural gas, depending on the mode of travel) consumption for transportation needs. The Project Site's location near robust transit opportunities (Metro Local Lines 108 and 110, CCB Lines 2, 3, 6, and CCB Rapid Line 6) would further reduce dependence on automobile travel, reducing the need to own an automobile and pay for parking. Also, the Project is located in a highly urbanized area in the City and would develop 362 multi-family residential units within an HQTAs, as defined by SCAG, and within a TPA as defined by SB 743, and also in close proximity to existing sources of employment and shopping. Specifically, consistent with the land use policies for TPAs, the Project would constitute compact, focused infill development in an established community with access to high-quality transportation. Given the urban nature of the Project Site area, Project residents would be able to walk and bike to work and to shop. As such, the Project's transportation energy consumption would have a negligible impact to California's oil supplies and impacts on energy resources would be less than significant.

Conclusion

As discussed above, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Therefore, impacts related to energy would be less than significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2019 CALGreen building code, and the City's Green Building Code. As these conservation policies are mandatory under the City's Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency. As discussed in more detail in response to Checklist Question VIII(b) (Greenhouse Gas Emissions – Plan/Policy/Regulation Consistency) and Checklist Question XI(b) (Land Use and Planning – Plan/Policy/Regulation Consistency), the Project would also be consistent with the LA Green Plan/Climate LA and SCAG's 2020-2045 RTP/SCS. The vertical expansion on the Project Site would serve to reduce VMT and associated transportation fuel usage within the region.

In order to meet reduction goals in the LA Green Plan/ClimateLA, LADWP will continue to implement programs to emphasize water conservation and will pursue securing alternative supplies, including recycled water and storm water capture. With regard to solid waste, the City implemented the RENEW LA plan to meet solid waste reduction

goals by expanding recycling to multi-family dwellings, commercial establishments, and restaurants. The Project would be indirectly affected by these actions and would further reduce water and solid waste generation, thereby meeting the goals of the LA Green Plan/ClimateLA. With respect to the Sustainable City pLAN, as described in more detail in response to Checklist Question VIII(b) (Greenhouse Gas Emissions – Plan/Policy/Regulation Consistency), although the pLAN is not directly applicable to private development projects, the Project would generally be consistent with the City’s targets related to decrease of VMT per capita by 5 percent by 2025 and to increase trips made by walking, biking, or transit by at least 35 percent by 2025. The Project would generally comply with these targets as the Project is an infill development consisting of residential and restaurant uses on the Project Site, which is located near regional and local transit services. The Project would be well-served by transit and would implement TDM measures that would encourage transit use. Furthermore, the Project would comply with the LA Green Building Code, which requires a 20 percent reduction in water use and a requirement to exceed Title 24 energy efficiency standards.

For these reasons, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

Electricity

The Project, in conjunction with the related projects, could result in a net increased demand for electricity supplies. LADWP’s 2017 SLTRP serves as a comprehensive 20-year plan to supply reliable electricity to the City in an environmentally responsible and cost effective manner. The 2017 SLTRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. Based on the projections and strategies within the 2017 SLTRP, energy efficiency and solar savings are expected to increase in the future and significantly reduce electricity demands. Thus, LADWP anticipates that it can meet the future demands of cumulative growth within its service area with implementation of regulatory and reliability initiatives and strategic initiatives. LADWP will continue to pursue and implement energy efficiency programs per SB 350, which has an adopted goal of achieving 50 percent renewable energy sources by 2030.

Furthermore, in accordance with current building codes and construction standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code and the City’s Green Building Code. Compliance with Title 24 energy conservation standards, City’s Green Building Code, and other energy conservation programs on the local level will further reduce cumulative energy demands. Additionally, as discussed above, LADWP is required to procure eligible renewable energy resources of 50 percent by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and

geothermal sources. These sources accounted for 30 percent of LADWP's overall energy mix in 2017, the most recent year for which data are available. This represents the available off-site renewable sources of energy that could meet the Project's and related projects energy demand. As such, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient and unnecessary use of electricity. Therefore, cumulative impacts related to electricity would be less than significant.

Natural Gas

The Project, in conjunction with the related projects, could result in a net increased demand for natural gas supplies. As a public utility provider, SoCalGas continuously analyzes increases in natural gas demands resulting from projected population and employment growth in its service area and it is anticipated that it would be able to meet the needs of future development within the region. Each of the related projects would be reviewed on a case-by-case basis to determine SoCalGas's ability to serve each related project. Additionally, compliance with energy conservation standards pursuant to Title 24 would reduce cumulative demand for natural gas resources. As such, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient and unnecessary use of natural gas. Therefore, cumulative impacts related to natural gas would be less than significant.

Transportation Energy

The Project, in conjunction with the related projects, could result in a net increased demand for transportation energy. As discussed previously, the NHTSA and CARB have implemented several policies, rules, and regulations to improve vehicle efficiency, increase the use of alternative fuels, and decrease the reliance on fossil fuels. It is anticipated that the future Project-related and related projects' vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption. Also, all of the related projects are located in a transit-rich area of the City and as such, provide opportunities for alternative sources of transportation. Thus, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient and unnecessary use of transportation energy. Therefore, cumulative impacts related to transportation energy would be less than significant.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined on Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative 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"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The information and analysis provided below is primarily based on the following (refer to Appendix E):

- *Preliminary Geotechnical Investigation Report, LGC Valley, Inc., October 5, 2020.*

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

No Impact. The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, and no known faults exist on the Project Site.³² The fault closest to the Project Site is the Newport-Inglewood Fault Zone, located approximately 3.4 kilometers from the Project Site.³³ Thus, the Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault on the Project Site. Therefore, no impacts related to this issue would occur as a result of the Project.

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

Less Than Significant Impact. Given the Project Site's location in a seismically active region, the Project Site could experience seismic groundshaking in the event of an earthquake. The fault closest to the Project Site is the Newport-Inglewood Fault Zone, located approximately 3.4 kilometers from the Project Site. Notwithstanding, the Applicant would be required to design and construct the Project in conformance to the most recently adopted LAMC and applicable recommendations made in the *Preliminary Geotechnical Investigation Report* prepared for the Project, dated October 5, 2020, and any updates made in a final geotechnical report. Conformance with the City's current Building Code requirements would minimize the potential for structural failure, injury, and loss of life during an earthquake event. The Project would not exacerbate the existing potential for strong seismic ground shaking. Therefore, Project impacts related to groundshaking would be less than significant.

³² *Preliminary Geotechnical Investigation Report, LGC Valley, Inc., October 5, 2020. Refer to Appendix E.*

³³ *Ibid.*

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

Less Than Significant Impact. According to the *Preliminary Geotechnical Investigation Report* prepared for the Project, the Project Site is located within a State of California Seismic Hazard Zone mapped liquefaction hazard area. As such, a liquefaction analysis was conducted for the site, considering the existing condition below with potentially liquefiable soils located from a depth of 10 feet from the ground surface with the highest historic groundwater elevation at a depth of 10 feet below the ground surface. This analysis determined that the potential for specific layers to liquefy within the upper 51.5 feet of site soils is low. However, it is estimated that the amount of total liquefaction-induced and dry sand settlement possible for the design conditions is up to approximately 0.25-inches, and a differential settlement of approximately 0.15-inches. Accordingly, the *Preliminary Geotechnical Investigation Report* recommends the Project's foundation be designed to account for such seismically induced settlements. Furthermore, the Applicant would be required to design and construct the Project in conformance to the most recently adopted LAMC and applicable recommendations made in the *Preliminary Geotechnical Investigation Report* prepared for the Project, dated October 5, 2020, and any updates made in a final geotechnical report. Conformance with the City's current Building Code requirements would minimize the potential for structural failure, injury, and loss of life associated with liquefaction. The Project would not exacerbate the existing potential for liquefaction. Therefore, Project impacts related to 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. Based on the relatively flat nature of the Project Site and review of the geologic literature pertinent to the site, there are no indications of landslides close to or within the limits of the site.³⁴ Thus, the Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, no impacts related to this issue would occur as a result of the Project.

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

Less Than Significant Impact. During the Project's construction phase, soil would be exposed. However, the Applicant would be required to implement SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site. Also, the Applicant would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared

³⁴ *Ibid.*

prior to any ground-disturbing activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if ground-disturbing activities occur during a rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during ground-disturbing activities.

Additionally, during the Project's operational phase, most of the Project Site would be developed with impervious surfaces, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. Therefore, with compliance with applicable regulatory requirements, development of the Project would not cause or exacerbate soil erosion or loss of topsoil and Project impacts related to soil erosion would be less than significant.

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

Less Than Significant Impact. As discussed in response to Checklist Question VII(a)(iii) (Geology and Soils – Liquefaction), it is estimated that the amount of total liquefaction-induced and dry sand settlement possible for the design conditions is up to approximately 0.25-inches, and a differential settlement of approximately 0.15-inches. Accordingly, the *Preliminary Geotechnical Investigation Report* recommends the Project's foundation be designed to account for such seismically induced settlements. Furthermore, the Applicant would be required to design and construct the Project in conformance to the most recently adopted LAMC and applicable recommendations made in the *Preliminary Geotechnical Investigation Report* prepared for the Project, dated October 5, 2020, and any updates made in a final geotechnical report. Conformance with the City's current Building Code requirements would minimize the potential for structural failure, injury, and loss of life associated with liquefaction. The *Preliminary Geotechnical Investigation Report* prepared for the Project (refer to Appendix E) did not identify any issues related to lateral spreading, subsidence, or collapse. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur as a result of the Project.

d) Would the project be located on expansive soil, as identified on Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

No Impact. The *Preliminary Geotechnical Investigation Report* prepared for the Project (refer to Appendix E) noted that based on subsurface conditions and reported geologic conditions at the Project Site, soils at the site have a “Very Low” expansion index. Thus, the Project would not be located on expansive soil, as identified on Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property. Therefore, no Project impacts related to this issue would occur as a result of the Project.

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 would connect to the City’s existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. Thus, the Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. Therefore, no impacts related to this issue would occur as a result of the Project.

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

Less Than Significant Impact. The Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. A records search was conducted with the Los Angeles County Natural History Museum to determine the likelihood for unique paleontological resources to occur at the Project Sites (refer to Appendix E). The records search revealed that no paleontological resources are known to exist at the Project Site, but resources are known to exist in the Project Site area in the same sedimentary deposits found at the Project Site.³⁵ As with all development in the City that includes any ground-disturbing activities, the Applicant would be required to comply with the City’s Standard Condition of Approval related to the inadvertent discovery of subsurface resources. If paleontological resources are encountered, the Applicant would be required to notify the Department of Building and Safety immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. The

³⁵ *Natural History Museum, Los Angeles County, Alyssa Bell, Ph. D., correspondence, July 17, 2021*
Refer to Appendix E.

paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, state, and local guidelines, including those set forth in PRC Section 5097.5. Therefore, by complying with the applicable regulatory requirements, Project impacts related to paleontological resources would be less than significant.

Cumulative Impacts

Geotechnical impacts related to future development in the City involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. The impacts on each site are specific to that site and its users and would not be in common or contribute to (or shared with, in an additive sense) the impacts on other sites. In addition, development on each site is subject to uniform site development and construction standards that are designed to protect public safety. Therefore, cumulative geotechnical impacts related would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS

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

The analysis provided below is primarily based on technical data prepared by NTEC (refer to Appendix B).

Environmental Setting

Climate Change Background

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and storms. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of GHG emissions in the atmosphere. GHG emissions are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature.

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHG emissions keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit. However, it is believed that excessive concentrations of anthropogenic GHG emissions in the atmosphere can result in increased global mean temperatures, with associated adverse climatic and ecological consequences.

GHG Emissions Background

GHG emissions include CO₂, methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃).³⁶ Carbon dioxide is the most abundant GHG. Other GHG emissions are less

³⁶ As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.

abundant but have greater global warming potential than CO₂. Thus, emissions of other GHGs are frequently expressed in their equivalent mass of CO₂, denoted as CO₂e. Forest fires, decomposition, industrial processes, landfills, and the consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions.

Regulatory Framework

There are any number of agreements, strategies, policies, regulations, and standards that relate to GHG emissions – from international climate accords to local climate action plans. The following plans, policies, and regulations are fundamental to the Project's determination of significance with respect to its GHG emissions and consistency with these documents.

State

AB 32 (California Global Warming Solutions Act of 2006) and SB 32

In September 2005, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, AB 32, into law. AB 32 committed the State to achieving the following:

- By 2010, reduce statewide GHG emissions to 2000 levels.³⁷
- By 2020, reduce statewide GHG emissions to 1990 levels.

CARB was tasked with determining what the statewide GHG emissions level was in 1990 and approving a statewide GHG emissions limit equivalent to that level, to be achieved by 2020. AB 32 further requires CARB to adopt rules and regulations that achieve the maximum technologically feasible and cost-effective GHG emissions reductions.

Signed in September 2016 by Governor Jerry Brown, SB 32 updates AB 32 to include an emissions reductions goal for the year 2030. Specifically, SB 32 requires CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030.

It should be noted that the State Legislature has not yet adopted a target for the 2050 horizon year, though Executive Order S-3-05 issued by Governor Schwarzenegger and Executive Order B-30-15 issued by Governor Jerry Brown each establish a GHG target of 80 percent below 1990 levels for this year.

Climate Change Scoping Plan

In 2008 CARB approved a Climate Change Scoping Plan (2008 Scoping Plan) detailing the approach that California would take to reduce its GHG emissions to 1990 levels by 2020, as required by AB 32. To achieve this, CARB determined that an approximate 28.5

³⁷ *The 2010 target to reduce GHG emissions to 2000 levels was not met.*

percent reduction in GHG emissions would be necessary. That is, projected 2020 GHG emissions (i.e., emissions that would occur in 2020, absent any GHG-reducing laws and regulations) would have to be reduced by 28.5 percent.

However, shortly after the adoption of the 2008 Scoping Plan, a lawsuit was filed challenging CARB's approval of the Climate Change Scoping Plan Functional Equivalent Document (FED to the Climate Change Scoping Plan). In May 2011, it was found that the environmental analysis of this document's alternatives was not sufficient under CEQA. In response to this ruling, CARB prepared a revised and expanded document, the Supplemental FED to the Climate Change Scoping Plan (Supplemental FED), approved in August 2011.

As part of the Supplemental FED, CARB updated the projected 2020 emissions inventory based on then-current economic forecasts (i.e., as influenced by the economic downturn) and GHG emissions reduction measures already in place.³⁸ Ultimately, CARB determined that achieving the 1990 emissions levels by 2020 would require a reduction in GHG emissions of 16 percent, down from the previous 28.5 percent figure.

CARB adopted the First Update to the Climate Change Scoping Plan: Building on the Framework (First Update) in 2014. The First Update found that California is on track to meet AB 32's 2020 emissions reduction mandate and determined that, by 2030, the State could reduce its GHG emissions to levels on course with those needed to achieve the 2050 target, if it realizes the expected benefits of its existing policy goals.³⁹ CARB further identified and developed recommended actions for six focus areas key to achieving the 2050 target: (1) energy; (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure); (3) agriculture; (4) water; (5) waste management; and (6) natural and working lands.

In December 2017, CARB adopted the 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target (2017 Update). The 2017 Update builds upon the successful framework established by the 2008 Scoping Plan and the First Update and identifies new, technologically feasible, and cost-effective strategies to ensure that the state meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. It includes policies to require direct GHG reductions at some of the state's largest stationary sources and mobile sources, such as use of lower

³⁸ *E.g. the million-solar-roofs program, AB 1493 (Pavley I) motor vehicle GHG emissions standards, and the Low Carbon Fuel Standard (LCFS). Pavley I, the first GHG standard in the nation for passenger vehicles, took effect for model years starting in 2009 to 2016. Pavley I could potentially result in a 27.7 million metric tons CO₂e reduction of GHG emissions by 2020. Pavley II covers model years 2017 to 2025 and could result in additional reductions of 4.1 million metric tons CO₂e.*

³⁹ *The 2050 goal of reducing GHG emissions to 80 percent below 1990 levels was originally established by Executive Order S-3-05, issued by Governor Schwarzenegger in June 2005. However, the 2050 goal was not codified by either AB 32 or SB 32.*

GHG fuels, efficiency regulations, and the Cap-and-Trade program, which constraints and reduces emissions at covered sources.

SB 97

Passed in August 2007, SB 97 required the State Office of Planning and Research (OPR) to prepare and develop CEQA guidelines for the effects and/or mitigation of GHG emissions, including effects associated with transportation and energy consumption. Subsequently, the Draft Guidelines Amendments for Greenhouse Gas Emissions (Guidelines Amendments) were adopted in December 2009 to address the specific obligations of public agencies when analyzing GHG emissions to determine a project's effect on the environment, as pursuant to CEQA.

However, the Guidelines Amendments provide no thresholds of significance or any specific mitigation measures; rather, they require a lead agency to make a good-faith effort to describe, calculate, or estimate the amount of GHG emissions that would result from a Project, to the extent possible based on scientific and factual data. The Guidelines Amendments give discretion to the lead agency whether to (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. Additionally, three factors that should be considered in the evaluation of the significance of GHG emissions are identified as follows:

- (1) The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;
- (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
- (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The administrative record for the Guidelines Amendments also clarifies “that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of CEQA’s requirements for the cumulative impact analysis.”⁴⁰

The California Natural Resources Agency is required to periodically update the Guidelines Amendments to incorporate new information or criteria established by CARB pursuant to AB 32. SB 97 applies to any environmental impact report (EIR), negative declaration, mitigated negative declaration, or other document requirement by CEQA.

⁴⁰ Letter from Cynthia Bryant, Director of the Governor’s Office of Planning and Research, to Mike Chrisman, California Secretary for Natural Resources, dated 13 April 2009.

Regional

2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

In September 2008 Governor Arnold Schwarzenegger signed the Sustainable Communities and Climate Protection Act of 2008, also known as SB 375, to align regional planning for housing and transportation with the GHG reduction goals outlined by AB 32. SB 375 requires each Metropolitan Planning Organization (MPO) to adopt a Sustainable Community Strategy (SCS) encouraging compact development that reduces passenger Vehicle Miles Traveled (VMT) and trips, all for the purpose of meeting CARB-determined regional GHG emissions reduction targets.

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. As the federally designated MPO for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain NAAQS. SCAG is also a co-producer, with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin's AQMP.

CARB set GHG reduction targets of 8 percent by 2020 and 19 percent by 2035 (compared with 2005 levels) for the SCAG region, effective as of October 1, 2018. Adopted on September 3, 2020, SCAG's long-range plan, the 2020-2045 RTP/SCS (Connect SoCal), serves as the roadmap to fulfilling the region's compliance with these latest GHG reduction targets. To this end, the 2020-2045 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked, and acknowledges how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region. The 2020-2045 RTP/SCS land use pattern continues the trend of focusing new housing and employment growth in the region's High Quality Transit Areas (HQTAs) and aims to enhance and build out the region's transit network. At the time of the previous 2016-2040 RTP/SCS, HQTAs accounted for just 3 percent of total land in the SCAG region, but they are projected to accommodate 46 percent of the region's future household growth and 55 percent of the region's future employment growth by 2040.⁴¹ HQTAs are a cornerstone of land use planning best practice in the SCAG region, and studies by the California Department of Transportation, the USEPA, and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption. In addition, HQTAs concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure

⁴¹ SCAG, *Final 2016-2040 RTP/SCS*, April 2017. HQTAs are defined as areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours.

costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability. As a result, HQTAs are vital to the attainment of regional GHG emissions reduction targets: successful implementation of the 2020-2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, reducing automobile use and, crucially, associated GHG emissions.

Local

City of Los Angeles Green LA Action Plan/Sustainability pLAN

The City began addressing the issue of global climate change by publishing Green LA: An Action Plan to Lead the Nation in Fighting Global Warming (LA Green Plan) in 2007. This document outlines goals and actions the City has established to reduce GHG emissions from both public and private activities. To facilitate implementation of the LA Green Plan, the City adopted the Los Angeles Green Code, as discussed below. In 2008 the City released an implementation program for the LA Green Plan referred to as ClimateLA, which provides detailed information about each action item discussed in the LA Green Plan framework. Action items range from harnessing wind power for electricity production and energy efficiency retrofits in City buildings, to converting the City's fleet vehicles to cleaner and more efficient models, and reducing water consumption.

The Sustainable City pLAN was a mayoral initiative in 2015 and includes both short-term and long-term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. Specific targets include the construction of new housing units within 1,500 feet of transit by 2017, reducing VMT per capita by five percent by 2025, and increasing trips made by walking, biking, or transit by at least 35 percent by 2025. The Sustainable City pLAN is to be updated every four years.

In 2019 the first four-year update to the 2015 Sustainability pLAN was released. This updated document, known as L.A.'s Green New Deal, expands upon the City's vision for a sustainable future and provides accelerated targets and new goals. L.A.'s Green New Deal has established targets such as 100 percent renewable energy by 2045, installation of 10,000 publicly available EV chargers by 2022 and 28,000 by 2028, diversion of 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035. The City's commitments related to renewable energy usage, water conservation, waste reduction, and other initiatives would all benefit the Project.

City of Los Angeles Green Building Code

In December 2019, the Los Angeles City Council approved Ordinance No. 186,488, which amended Chapter IX of the LAMC, referred to as the Los Angeles Green Building Code, by adding a new Article 9 to incorporate various provisions of the 2019 CALGreen Code.

Projects filed on or after January 1, 2020, must comply with the provisions of the Los Angeles Green Building Code.

Existing Conditions

Existing Statewide GHG Emissions

As reported by the California Energy Commission (CEC), California contributes approximately one percent of global and 6.4 percent of national GHG emissions.⁴² California contains approximately 12 percent of the national population. CARB reports that in 2019, emissions from GHG emissions statewide were 418 million MT of CO₂e, 7 million MT of CO₂e lower than 2018 levels and nearly 13 million MT of CO₂e below the State's 2020 GHG limit of 431 million MT of CO₂e. Forty-eight percent of the State's total electricity generation (in-state generation plus imported electricity) came from zero-GHG generation sources (e.g. solar, wind, hydropower, nuclear, etc.). Per capita GHG emissions have dropped from a 2001 peak of 14.0 MT per person to 10.5 MT per person in 2019, a 25 percent decrease. The transportation sector remains the largest source of GHG emissions, accounting for almost 40 percent of the State's GHG inventory (though when emissions from extracting, refining, and moving transportation fuels are included, this figure increases to over 50 percent of statewide emissions for 2019).⁴³

Existing Project Site Emissions

The northern portion of the Project Site is currently improved with a single-story, multi-tenant commercial plaza and a single-story, multi-tenant industrial building. Both contain associated surface parking. The southern portion of the site is improved with Dinah's restaurant and its associated surface parking. As noted earlier, this restaurant use would be maintained as part of the Project. However, its existing surface parking would be removed. Emissions associated with the Project Site's existing land usage were estimated for informational purposes, and it was determined that the site's existing operations may generate approximately 1,384 MT of CO₂e annually.

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

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

Less Than Significant Impact. For the Project, no applicable numeric significance threshold for GHG emissions has been adopted by the State, SCAQMD, or the City of Los Angeles. Although state, regional, and local plans and policies have been adopted to

⁴² California Energy Commission. *Tracking Progress, Greenhouse Gas Emission Reductions*. www.energy.ca.gov/renewables/tracking_progress/documents/Greenhouse_Gas_Emissions_Reductions.pdf. Last updated December 2018.

⁴³ CARB, *California Greenhouse Gas Emissions for 2000 to 2017*. 2019.

help address climate change, no current law or regulation would regulate all aspects of the Project's GHG emissions. In the absence of any adopted numeric threshold, the significance of the Project's GHG emission is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. As discussed earlier, for this Project, the most directly applicable adopted plans and policies to reduce GHG emissions are the AB 32 Scoping Plan and subsequent updates, SCAG's 2020-2045 RTP/SCS, and the City's Sustainability pLAN/Green New Deal. Thus, the Project would not have a significant effect on the environment if it is found to be consistent with these applicable plans and policies to reduce GHG emissions.

Consistency with Applicable Plans and Policies

As described above, compliance with applicable GHG emissions reduction plans would result in a less than significant Project-level and cumulative impact. The following section describes the extent the Project complies with the performance-based standards included in the regulations outlined in the Scoping Plan and its subsequent updates, the 2020-2045 RTP/SCS, and the Sustainable pLAN/Green New Deal. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

Climate Change Scoping Plan

The Climate Change Scoping Plan sets forth a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a Cap-and-Trade system, and an AB 32 implementation fee to fund the program. The following discussion demonstrates how the pertinent reduction actions relate to and reduce project-related GHG emissions. Table VIII-1 contains an evaluation of applicable reduction actions/strategies by emissions source category outlined in the Climate Change Scoping Plan that through implementation would serve to indirectly reduce Project GHG emissions. Further evaluation of project design features and specific applicable policies and measures in the Climate Change Scoping Plan is provided on Table VIII-2. As shown therein, the Project would not conflict with the policies included in the Climate Change Scoping Plan. Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets.

**Table VIII-1
Mandatory Regulatory Compliance Measures within the Climate Change Scoping Plan**

Mandatory Regulatory Compliance Measures
<p>Energy</p> <p>RPS Program and SB 2X: The California RPS program (Updated under Senate Bill 2X) required both public and investor-owned utilities in California to receive at least 33 percent of their electricity from renewable sources by the year 2020. SB 350 further required 50 percent renewables by 2030.¹ LADWP reports that, as of 2018, it has achieved 32% renewables and is on track to exceed the next state-legislated milestone of 33 percent by 2020.² However, under the recently passed SB 100, LADWP is required to generate electricity that would increase renewable energy resources to 50 percent by 2026, 60 percent by 2030, and 100 percent by 2045. Additionally, the City’s latest Green New Deal (an update of the Sustainable City pLAn) sets a target for LADWP to supply 55 percent renewable energy by 2025 and 80 percent by 2036. For 2045, the Green New Deal and SB 100 share the same 100 percent renewables requirement. The Project complies with these percentage renewables requirements inasmuch as the Project is served by LADWP, which is tasked with and committed to achieving the noted goals and requirements.</p> <p>The Project’s electricity GHG emissions provided on Table VIII-5 do not account for these rapidly changing, and escalating, renewables requirements. By the Project buildout year of 2026, it is reasonable to assume that LADWP may supply approximately 55 percent renewable energy, in line with the Green New Deal’s 55 percent target for 2025.</p> <p>SB 350: As required under SB 350, a doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, the California Energy Code (CEC), and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation.</p> <p>Energy Independence and Security Act of 2007 (EISA): EISA requires the phasing out of incandescent light bulbs sold in the United States, resulting in 25 percent greater light bulb efficiency in 2014 and 200 percent greater efficiency in 2020. CalEEMod does not incorporate this nationwide reduction in electricity usage associated with lighting.</p> <p>Cap-and-Trade Program: As required by AB 32 and the Climate Change Scoping Plan, the Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, this regulatory program applies to electricity service providers and not directly to land use development. That being said, the Project would benefit from this regulatory program in that the GHG emissions associated with the Project’s electricity usage per year would indirectly be covered by the Cap-and-Trade Program, though this is not quantified in the</p>

**Table VIII-1
Mandatory Regulatory Compliance Measures within the Climate Change Scoping Plan**

Mandatory Regulatory Compliance Measures
analysis. Furthermore, the program also covers GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported.
Mobile
<p>Advanced Clean Cars Program: CARB approved the Advanced Clean Cars Program in 2012 which establishes an emissions control program for model year 2017 through 2025 and increases the number of zero emission vehicles manufactured in the 2018 through 2025 model years. Standards under the Advanced Clean Cars Program apply to all passenger and light duty trucks within California and indirectly used by Project users. Mobile source GHG emissions estimated for the Project conservatively do not include this additional 34 percent reduction in mobile source emissions as the CalEEMod model default fleet mix for the Air Basin does not yet account for this regulation.</p> <p>The Scoping Plan recommends additional mobile source strategies through the extension of the Advanced Clean Cars Program which are expected to increase GHG stringency on light duty autos and continue adding zero emissions and plug in vehicles through 2030. CARB is also developing the Innovated Clean Transit measure to encourage purchase of advanced technology buses such as alternative fueled or battery powered buses. This would allow fleets to phase in cleaner technology in the near future. CARB is also in the process of developing proposals for new approaches and strategies to achieve zero emission trucks under the Advanced Clean Local Trucks (Last Mile Delivery) Program.^{3,4} Although the Innovative Clean Transit and Advanced Clean Local Truck Programs have not yet been established, the Project would also indirectly benefit from these measures once adopted.</p> <p>Low Carbon Fuel Standard (LCFS): The previous LCFS, adopted in 2007, required a reduction of at least 10 percent in the carbon intensity (CI) of California’s transportation fuels by 2020. CalEEMod includes implementation of LCFS into the calculation of GHG emissions from mobile sources. However, the LCFS was amended in September 2018 to target a 20-percent reduction in CI from a 2010 baseline by 2030.⁵ This additional 10-percent reduction in CI would indirectly reduce mobile source emissions from Project users.</p>
Solid Waste
<p>California Integrated Waste Management Act of 1989: This regulation requires each jurisdiction’s source reduction and recycling element to include a diversion of 50 percent of all solid waste by 2000.⁶ AB 341 in 2011 amended the regulation to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated</p>

**Table VIII-1
Mandatory Regulatory Compliance Measures within the Climate Change Scoping Plan**

Mandatory Regulatory Compliance Measures	
	<p>be source reduced, recycled, or composted by the year 2020, and annually thereafter.⁷ The Project complies with these percentage recycling requirements inasmuch as the Project is served by the City of Los Angeles, which currently achieves a diversion rate of 76 percent. Project-related GHG emissions would achieve at least a 50-percent reduction in solid waste generation source emissions, consistent with the minimum diversion rate required for the City of Los Angeles. It should be noted that the CalEEMod default diversion rate is zero percent, and this has not been adjusted to reflect AB 341. The Applicant must also only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341.</p>
¹	<i>SB 350 (2015-2016 Regular Session) Stats 2015, Ch. 547.</i>
²	<i>LADWP. <a)))))))&_afloop='296319701441951&_afWindowMode=0&_afWindowId=null#%40%3F_ad%2529%2529%2529%2529%2529%2529%2529%2529%3D%26_afWindowId%3Dnull%26_afLoop%3D296319701441951%26_afWindowMode%3D0%26_adf.ctrl-state%3DUquq0l6w9_17"' href="https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-renewableenergy/a-p-renewableenergypolicy?_adf.ctrl-state=1m681gocp_4&_ad">https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-renewableenergy/a-p-renewableenergypolicy?_adf.ctrl-state=1m681gocp_4&_ad")))))))&_afLoop=296319701441951&_afWindowMode=0&_afWindowId=null#%40%3F_ad%2529%2529%2529%2529%2529%2529%2529%2529%3D%26_afWindowId%3Dnull%26_afLoop%3D296319701441951%26_afWindowMode%3D0%26_adf.ctrl-state%3DUquq0l6w9_17. Accessed August 1, 2021.</i>
³	<i>CARB, Advance Clean Cars, Midterm Review, www.arb.ca.gov/msprog/acc/acc-mtr.htm.</i>
⁴	<i>CARB, Advanced Clean Local Trucks (Last mile delivery and local trucks), ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks.</i>
⁵	<i>CARB, LCFS Rulemaking Documents, www.arb.ca.gov/fuels/lcfs/rulemakingdocs.htm.</i>
⁶	<i>California Integrated Waste Management Act of 1989 and AB 341.</i>
⁷	<i>AB 341, 2011.</i>

**Table VIII-2
Consistency Analysis – Climate Change Scoping Plan**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
<p>SCAQMD Rule 445 (Wood Burning Devices): Requires use of natural gas to power all cooking stoves and fireplaces.</p>	<p>SCAQMD</p>	<p>No conflict. The Project would not include wood burning devices or stoves.</p>
<p>California Code of Regulations (CCR), Title 20: The 2016 Appliance Efficiency Regulations, adopted by the CEC, include standards for new applicants (e.g., refrigerators) and lighting, if they are sold or offered for sale in California</p>	<p>State and CEC</p>	<p>No conflict. The Project would be outfitted with appliances and lighting that comply with the CEC’s standards, which are included in default CalEEMod parameters and thus reflected in Project-related estimated GHG emissions.</p>
<p>CCR, Title 24, Building Standards Code: The 2019 Building Energy Efficiency Standards contained in Title 24, Part 6 (also known as the California Energy Code), requires the design of building shells and building components to conserve energy.</p> <p>The California Green Building Standards Code (Part 11, Title 24) established mandatory and voluntary standards on planning and design for sustainable site development, energy efficiency (extensive update of the California Energy Code), water conservation, material conservation, and internal air contaminants.</p>	<p>State and CEC</p>	<p>No conflict. Consistent with regulatory requirements, the Project must comply with applicable provisions of the Los Angeles Green Code that in turn require compliance with Title 24 and the California Green Building Standards.¹ It is worth noting that single-family homes built to the latest 2019 standards are expected to use about 7 percent less energy than those built under the previous 2016 standards. For nonresidential buildings, this reduction is about 30 percent.</p>
<p>Assembly Bill 1109 (AB 1109): The Lighting Efficiency and Toxic</p>	<p>State Manufacturers</p>	<p>No conflict. The Project would not conflict with the requirements under AB</p>

**Table VIII-2
Consistency Analysis – Climate Change Scoping Plan**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Reduction Act establishes standards structured to reduce average statewide electrical energy consumption by not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018. ² State and CEC		1109 because it would comply with local and state green building programs.
Senate Bill (SB) 375: SB 375 requires integration of planning processes for transportation, land use, and housing. Under SB 375, each MPO is required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet a target, created by CARB, for reducing GHG emissions.	State, CARB, Regional, SCAG	No conflict. In 2018, CARB adopted a target reduction for the SCAG region of 19 percent for 2035 from passenger vehicle use. The Project would not conflict with requirements under SB 375 as the Project is an infill development located within a HQTA and therefore consistent with the land use patterns and smart growth policies encouraged by the latest RTP/SCS. The Project's consistency with the latest RTP/SCS is discussed further in the subsequent section of this report.
By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emissions vehicle zones, parking pricing, transit discounts, etc.).	CalSTA, Caltrans, CTC, OPR/SGC, CARB	No conflict. The Project would not conflict with this policy, which would not be implemented at a project level.
CCR, Title 24, Building Standards Code: The California Green Building Standards Code (Part 11, Title 24) includes water efficiency requirements for new residential and non-residential	State	No conflict. The Project would comply with applicable provisions of the 2020 Los Angeles Green Building Code, which in turn require compliance with mandatory standards included within

**Table VIII-2
Consistency Analysis – Climate Change Scoping Plan**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
uses, in which buildings shall demonstrate a 20-percent overall water use reduction.		the latest California Green Building Standards.
Senate Bill X7-7: The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state has been required to make incremental progress toward this goal. This is an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy necessary, and associated emissions, to convey, treat, and distribute water. It also reduces emissions from wastewater treatment.	CARB	No conflict. As discussed, the Project would comply with applicable provisions of the 2020 Los Angeles Green Building Code, and in turn the latest California Green Building Standards, that require a 20-percent water use reduction.
CARB In-Use Off-Road Regulation: CARB’s in-use off-road diesel vehicle regulation (“Off-Road Diesel Fleet Regulation”) requires the owners of off-road diesel equipment fleets to meet fleet average emissions standards pursuant to an established compliance schedule.	CARB	No conflict. The Applicant would use construction contractors that would comply with this regulation.
CARB In-Use On-Road Regulation: CARB’s in-use on-road heavy-duty vehicle regulation (“Truck and Bus Regulation”) applies to nearly all	CARB	No conflict: The Applicant would use construction contractors that would comply with this regulation.

**Table VIII-2
Consistency Analysis – Climate Change Scoping Plan**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
privately and federally owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating greater than 14,000 pounds. ³		
<p>Implement the Short-Lived Climate Pollutant Strategy by 2030:</p> <ul style="list-style-type: none"> • 40 percent reduction in methane and hydrofluorocarbon emissions below 2013 levels. • 50 percent reduction in black carbon emissions below 2013 levels. 	CARB, CalRecycle, CDFA, SWRCB, Local air districts	<p>No conflict. Senate Bill 605 (SB 605) was adopted in 2014 and directs CARB to develop a comprehensive Short-Lived Climate Pollutant (SLCP) strategy. Senate Bill 1383 was later adopted in 2016 to require CARB to set statewide 2030 emission reduction targets of 40 percent for methane and hydrofluorocarbons and 50 percent black carbon emissions below 2013 levels.⁴</p> <p>The Project would comply with the CARB SLCP Reduction Strategy which limits the use of hydrofluorocarbons for refrigeration uses.</p>
<p>¹ The 2019 Title 24 standards had an effective date of January 1, 2020. ² Assembly Bill 1109 (2007-2008 Reg. Session) Stats. 2007, Ch. 534. ³ CARB, Truck and Bus Regulation – On-Road Heavy Duty Diesel Vehicles (In-Use) Regulation, www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm. ⁴ CARB, Reducing Short-Lived Climate Pollutants in California, www.arb.ca.gov/cc/shortlived/shortlived.htm.</p>		

2020-2045 RTP/SCS

As discussed previously, the 2020-2045 RTP/SCS is expected to help the SCAG region, and in turn California, reach its latest GHG reduction goals. Implementation of the 2020-2045 RTP/SCS is projected to reduce per capita transportation emissions by 8 percent by 2020 and 19 percent by 2035, thus enabling the region to fulfill its portion of SB 375 compliance. As discussed in detail in Section 3 (SCEA Criteria and Transit Priority Project Consistency Analysis), the Project would be consistent with the 2020-2045 RTP/SCS.

Generally, projects are considered consistent with the provisions and policies of applicable City and regional land use plans and regulations if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The land use pattern emphasized by the 2020-2045 RTP/SCS (as well as its previous iteration) involves concentrating new, dense housing and/or job growth in infill locations and HQTAs in an effort to facilitate alternative transportation modes and reduce vehicle trips and VMT. Development of the Project would be consistent with this land use pattern and smart growth policies to increase housing density within HQTAs. Not only would the Project be located within a HQTA, but it would contribute to the RTP/SCS's goal of encouraging growth of walkable and mixed-use communities with ready access to transit infrastructure and employment. The latest RTP/SCS specifically encourages the development of medium and high-density housing to create strategic nodes along existing or future transit corridors to better leverage transit investments and allow for the replacement of under-performing, auto-oriented, single-story retail uses. It also encourages "center focused placemaking," an approach that generally involves the creation of compact and pedestrian-oriented neighborhoods with a mix of residential, employment, and retail/recreational options. The Project's neighborhood is a designated "Pedestrian Enhanced District" (per the City's Mobility Plan 2035) anchored by a pedestrian-oriented shopping destination (Howard Hughes Center), high-rise office buildings, and new and under-construction dense residential uses. By developing additional dense residential housing in a low-intensity infill location (i.e., an auto-oriented strip mall with large surface parking) that is also within a HQTA and this Pedestrian Enhanced District, the Project would contribute directly to the goals of SCAG's RTP/SCS and its implementation strategies. Given these considerations, the Project is appropriately located and supports the RTP/SCS and its smart growth strategies to efficiently coordinate land usage and transportation in an effort to reduce VMT and related GHG emissions.

Sustainable City pLAN/Green New Deal

As discussed earlier, the Sustainable City pLAN, a mayoral initiative, includes both short-term and long-term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. Though the Sustainable City pLAN and its update, the City's Green New Deal, are not

plans that have been adopted solely to reduce GHG emissions, the Green New Deal includes climate mitigation as one of eight explicit benefits that help define its strategies and goals.

Generally, these plans provide information as to how the City will manage buildings and infrastructure in its control. They also provide specific targets related to housing and development, as well as mobility and transit. For example, targets include reducing VMT per capita by 5 percent by 2025, and increasing trips made by walking, biking, or transit by at least 35 percent by 2025. The latest Green New Deal document establishes targets such as achieving 100 percent renewable energy by 2045, diverting 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035. Although the Sustainable City pLAN and Green New Deal are not adopted plans that are directly applicable to private development projects, the Project would benefit from the City's commitment to the goals and aspirations outlined in these documents.

Consistency Conclusion

In summary, the consistency analysis provided above demonstrates that the Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. As a result, the Project's GHG emissions would not result in a significant impact to the environment, and Project-specific impacts with regard to climate change would be less than significant.

Project Emissions

As discussed above, compliance with applicable GHG emissions reductions plans renders a Project less than significant. In support of the consistency analysis provided above, the following quantitative estimates of the Project's GHG emissions are provided. The Project would result in direct and indirect GHG emissions generated by the following emissions sources:

- Construction: emissions associated with construction-related equipment and vehicle use.
- Area Sources: emissions associated with the on-site use of powered equipment.
- Energy Sources: emissions associated with the Project's electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting.
- Mobile Sources: emissions associated with the Project's related vehicle travel.
- Water/Wastewater: emissions associated with energy used to pump, convey, deliver, and treat water.

Construction

Project construction is anticipated to last approximately 41 months. A summary of construction details (e.g. schedule, equipment mix, and vehicular trips) is included in Appendix B. The GHG emissions associated with the construction of the Project were calculated by year and totaled. A summary of GHG emissions for each year of construction is presented on Table VIII-3. As shown, construction of the Project is estimated to generate approximately 2,541.5 MTCO_{2e}. As recommended by the SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project’s annual operational emissions) in order to determine the Project’s annual GHG emissions inventory.⁴⁴ This results in annual Project construction emissions of approximately 84.7 MTCO_{2e}.

**Table VIII-3
Construction-Related Emissions**

Year	Emissions (MTCO_{2e})
2023	455.1
2024	846.3
2025	890.2
2026	349.9
Total	2,541.5
Amortized over 30 years	84.7

Source: NTEC, 2021.

Operations

As shown on Table VIII-4, the Project is estimated to generate approximately 3,558.2 MTCO_{2e} per year, including the addition of its annualized construction-related GHG emissions. The Project’s preservation and continued operations of the existing Dinah’s Family Restaurant would not constitute a change to the environment. As such, most emissions associated with the operations of this restaurant have not been incorporated into the analysis and results shown on Table VIII-4. The analysis and results do however account for operations emissions associated with this use’s parking, as its parking would be relocated from the existing surface parking lot (which would be demolished) to within the proposed parking garage.

⁴⁴ SCAQMD Governing Board Agenda Item 31. December 5, 2008.

**Table VIII-4
Annual GHG Emissions Summary**

Source	Emissions (MTCO _{2e})
Area	6.2
Energy	1,106.3
Mobile	2,067.9
Solid Waste	105.9
Water/Wastewater	187.2
Construction	84.7
Total Emissions	3,558.2
<i>Source: NTEC, 2021.</i>	

Cumulative Impacts

As explained earlier, the analysis of a project’s GHG emissions is inherently a cumulative impact analysis because climate change is a global problem and the emissions from any single project alone would be negligible. Accordingly, the analysis above took into account the potential for the Project to contribute to the cumulative impact of global climate change. Given the Project’s consistency with statewide, regional, and local plans adopted for the reduction of GHG emissions, it is concluded that the Project’s incremental contribution to greenhouse gas emissions and its effect on global climate change would not be cumulatively considerable. For these reasons, the Project’s cumulative contribution to global climate change would be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The information and analysis provided below is primarily based on the following (refer to Appendix F):

- *Phase I Environmental Site Assessment, Weis Environmental, September 24, 2020.*

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 of hazardous materials that would be used during construction of the Project would be typical of those hazardous materials necessary for construction of a residential development (e.g., paints, solvents, fuel for construction equipment, building materials, etc.). Although construction of the Project would require the temporary transport, use, and disposal of hazardous waste, construction activities associated with Project would be required to comply with all applicable federal, state, and local regulations governing such activities.

The 2.205-acre Project Site is currently developed with approximately 24,000 square feet commercial of uses, Dinah's restaurant, and associated surface parking. With the exception of Dinah's restaurant use, all existing uses would be demolished and removed from the Project Site, and the site would be developed with an eight-story, 362-unit multi-family residential building, with approximately 3,700 square feet of ground-floor restaurant (in addition to Dinah's). The proposed mixed-use development would be similar to other mixed-used developments already found in the Project Site area and region. The Project would use common types of cleaning products, paint, petroleum products, etc. and would not require the routine transport, use, or disposal of hazardous materials that would pose a significant hazard to the public or environment. Therefore, Project impacts related to the transport, use, and disposal of hazardous materials would be less than significant.

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

Less Than Significant Impact. A *Phase I Environmental Site Assessment (Phase I ESA)* was prepared for the Project (refer to Appendix F) by Weis Environmental. The purpose of the Phase I ESA was determined if there are any recognized environmental concerns (RECs) associated with the Project Site.⁴⁵ The *Phase I ESA* included a review of current and historical records associated with on- and off-site uses; a property inspection and viewing of adjacent and surrounding properties for conditions that could be RECs; interviews with present and past owners, operators and/or occupants of a property, and

⁴⁵ *An REC is defined by the ASTM Standard Practice E1527-13 as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.*

local government officials; and an evaluation of the information gathered as part of the records review, site reconnaissance, and interviews.

With the exception of the former use of the 6511 S. Sepulveda tenant space (a portion of the Project Site) as a dry cleaners business, no suspect features and/or conditions indicating the presence or likely presence of hazardous substances and/or petroleum products at the site were identified. However, there are no references to the manifesting or removal of dry-cleaners-related waste in the databases, nor are there any violations or releases noted for the former dry cleaners business. As such, if on-site dry cleaning had been performed, it would have likely be completed in a closed-loop, self-contained system. Upon further inquiry with the designated site owner representative, it was determined that this and subsequent dry cleaning businesses that operated in this space did not conduct on-site dry cleaning operations and that these businesses served as pick-up/drop-off locations. Cleaning was reportedly conducted at an off-site remote plant. It is common for businesses and their primary addresses to appear on regulatory databases indicating cleaners related uses regardless of whether or not they conducted actual cleaning activities on-site or at an off-property location. This former site use is not considered to be a recognized environmental condition in connection with the site.

Given the age of some of the existing buildings on the Project Site, it is possible that asbestos-containing materials (ACMs) and lead-based paint (LBP) could be encountered at the Project Site during the demolition and remodeling period. As such, the Applicant would be required as part of the Project permitting process to provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no ACMs are present in the building. If ACMs are found to be present, the ACMs would need to be abated in compliance with SCAQMD's Rule 1403, as well as other applicable state and federal rules and regulations. Also, the Applicant would be required as part of the Project permitting process to submit an LBP survey to the Department of Building and Safety. Should LBP materials be identified, standard handling and disposal practices shall be implemented pursuant to Occupational Safety and Health Administration (OSHA) regulations.

For these reasons, the Project would not create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, Project impacts related to this issue would be less than significant.

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?

No Impact. No schools are located within 0.25 miles of the Project Site. The school closest to the Project Site is the Playa del Rey Elementary School, located approximately 0.7 miles northwest of the Project Site. Thus, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste

within one-quarter mile of an existing or proposed school. Therefore, no impacts related to this issue would occur.

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?

No Impact. The Project is not included on any list compiled pursuant to Government Code Section 65962.5 (i.e., certain hazardous waste facilities, sites that include leaking USTs, contaminated drinking water wells, and landfills with migrating hazardous waste).⁴⁶ Thus, the Project would not create a significant hazard to the public or the environment as a result of being listed on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, no impacts related to this issue would occur.

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

Less Than Significant Impact. The Project Site is not located approximately two miles northeast of Los Angeles International Airport. The Project Site is located within a designated airport hazard area, which is an area whose boundaries impose height limitations on the use of the land. Development within an airport hazard area that is above an elevation of 126 feet above sea level (asl) is limited to a height of 250 feet. The Project Site is at approximately 32 feet asl, and the maximum height of the proposed building is 96 feet, 4 inches. Thus, the Project would comply with the height requirements for the airport hazard area. Additionally, the Project would not produce any airport-related noise. As such, the Project would not result in a safety hazard or excessive noise for people residing or working in the project area. Therefore, Project impacts related to this issue would be less than significant.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Project would not require the closure of any public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, temporary and limited off-site construction activities could occur in adjacent street rights-of-way during certain periods of the day. Access to the Project Site and surrounding area during construction of the Project would be maintained in accordance with standard construction management plans that would

⁴⁶ Department of Toxic Substance Control, <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress>, accessed July 5, 2021.

be implemented to ensure adequate circulation and emergency access. Prior to issuance of a building permit, the Applicant would be required by the City to develop an emergency response plan in consultation with the Los Angeles Fire Department (LAFD). The emergency response plan shall include but not be limited to: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. Through compliance with this City requirement, Project impacts related to this issue would be less than significant.

g) Would the project expose people or structures either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project Site is located in an urbanized area of the City that is not at risk of experiencing wildland fires. Thus, the Project would not expose people or structures either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Therefore, Project impacts related to wildland fires would occur as a result of the Project.

Cumulative Impacts

The geographic extent of the Project's environmental impacts is limited to the Project Site and would not contribute to any other potential environmental impact that may occur beyond the boundaries of the Project Site. All related projects would be subject to discretionary or ministerial review by their respective jurisdictions, which would be responsible for assessing potential hazards risks associated with those related projects, and if necessary, the applicants of those projects would be required to implement measures appropriate for the type and extent of hazardous materials present and the land use proposed to reduce the risk associated with the hazardous materials to an acceptable level. As stated previously, the Project would not result in any significant impacts related to hazards and hazardous materials. Therefore, no significant Project cumulative impacts related to hazards and hazardous materials would occur.

X. 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 or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In a flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater?

Less Than Significant Impact. In its existing condition, the Project Site is completely developed with impervious surface, including buildings and paved parking areas. All stormwater that encounters the site is directed to the City's local storm drain system. With the exception of Dinah's restaurant, the Project includes demolition and removal of all existing uses from the site and development of the site with an eight-story, 362-unit multi-family residential building, with approximately 3,700 square feet of ground-floor restaurant (in addition to Dinah's). During the Project's construction phase, soil would be temporarily exposed. In addition, on-site watering activities to reduce airborne dust would occur. Also, construction-related materials, including adhesives, coatings, lubricants, and fuel would be temporarily stored on the Project Site. However, the Applicant would be required to comply with the National Pollutant Discharge Elimination System (NPDES) General Construction Permit including the preparation of a Stormwater Pollution Prevention Plan (SWPPP) and implementation of best management practices (BMPs), required to minimize soil erosion/sedimentation and other runoff from the Project Site from entering the storm drains during the construction period. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City's discharge requirements would ensure that any construction stormwater runoff would not violate water quality and/or discharge requirements.

Additionally, during the Project's operational phase, most of the Project Site would be developed with impervious surfaces, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. However, the Applicant would still be required to comply with the City's Low Impact Development (LID) Ordinance. The LID Ordinance applies to all development and redevelopment in the City that requires a building permit. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project would be required to capture and treat the first 3/4-inch of rainfall from a storm event or the runoff associated with the 85th percentile, 24-hour storm event, whichever is greater, in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would control the amount of surface water runoff leaving the Project Site. Compliance with the LID Plan and Standard Urban Stormwater Mitigation Plan (SUSMP), including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.

Conformance with these regulations would ensure construction and operational activities would not violate water quality standards, waste discharge requirements, or otherwise

substantially degrade water quality. Therefore, Project impacts related to water quality would be less than significant.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No Impact. In its existing condition, the Project Site is completely developed with impervious surface, including buildings and paved parking areas. All stormwater that encounters the site is directed to the City's local storm drain system. Under the post-Project conditions, most of the Project Site would also be developed with impervious surfaces, and all stormwater would be directed toward BMP features and/or the local storm drain system. The Project Site is not a source of groundwater recharge. Potable water would be provided to the Project from the Los Angeles Department of Water and Power's (LADWP) existing water supply sources. Thus, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Therefore, no Project impacts related to groundwater recharge would occur.

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, or through the addition of impervious surfaces, in a manner, which would result in substantial erosion or siltation on- or off-site?

i) Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. With the exception of Dinah's restaurant, the Project includes demolition and removal of all existing uses from the Project Site and development of the site with an eight-story, 362-unit multi-family residential building, with approximately 3,700 square feet of ground-floor restaurant (in addition to Dinah's). No rivers or streams are located on or near the Project Site. During the Project's construction phase, soil would be exposed. However, the Applicant would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. While grading and construction activities may temporarily alter the existing drainage patterns of the site, BMPs would be implemented to minimize soil erosion impacts during Project grading and construction activities. In addition, the Applicant would be required to implement a LID Plan (during operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. Specifically, the LID Plan would require the implementation of stormwater BMPs to retain or treat the runoff from a storm event producing 3/4-inch of rainfall or the runoff associated with the 85th percentile, 24-hour storm event, whichever is greater. Thus, the Project would not 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. Therefore, Project impacts related to erosion or siltation would be less than significant.

ii) Substantially increase the rate or amount or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. In its existing condition, the Project Site is completely developed with impervious surface, including buildings and paved parking areas. All stormwater that encounters the site is directed to the City's local storm drain system. Under the post-Project conditions, most of the Project Site would also be developed with impervious surfaces, and all stormwater would be directed toward BMP features and/or the local storm drain system. The Project would not increase the rate or amount of surface runoff from the site.

The City uses the Los Angeles County Department of Public Works Hydrology Manual for designing and hydrology and drainage infrastructure. The Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm even and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. The Project would be required by the City to control stormwater runoff from the Project Site to meet these requirements. Runoff would follow new discharge paths and drain to on-site storm drain infrastructure, including catch basins, planter drains, building roof drain downspouts, etc., throughout the Project Site. The rate and amount of stormwater runoff would be controlled through this on-site BMP infrastructure and could be accommodated by the City's existing storm drain system. Thus, the Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Therefore, Project impacts related to flooding would be less than significant.

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

Less Than Significant Impact. Regarding storm drain capacity, refer to response to Checklist Question X(c)(ii) (Hydrology and Water Quality – on- or off-site flooding. Regarding water quality, refer to response to Checklist Question X(a) (Hydrology and Water Quality – Water Quality).

iv) Impede or redirect flood flows?

No Impact. The Project Site is not located within a 100-year zone, as mapped by the Federal Emergency Management Agency (FEMA).⁴⁷ Thus, the Project would not have the potential to impede or redirect flood flows. Therefore, no impacts related to this issue would occur.

⁴⁷ FEMA, <https://msc.fema.gov/portal/search?AddressQuery#searchresultsanchor>, accessed July 20, 2021.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. The Project Site is not in an area susceptible to seiches, tsunamis, or mudflows. Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. Therefore, no impacts related to this issue would occur.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As discussed previously, the Project would be required to comply with the NPDES General Construction Permit, including the preparation of a SWPPP and implementation of BMPs that would require the Project to minimize soil erosion/sedimentation and other runoff from the site from entering the storm drains during the construction period. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Sites would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City's discharge requirements, would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements. Therefore, Project impacts related to this issue would be less than significant.

Cumulative Impacts

The site of the proposed Project and the related projects are located in an urbanized area where most of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. When new construction occurs it generally does not lead to substantial additional runoff, since new developments is required to control the amount and quality of stormwater runoff coming from their respective sites. Additionally, all new development in the City is required to comply with the City's LID Ordinance and incorporate appropriate stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Therefore, Project cumulative impacts related to hydrology and water quality would be less than significant.

XI. 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 type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Would the project physically divide an established community?

No Impact. The Project Site is located in an urbanized area of the City and is currently developed. The Project Site is surrounded by existing development and roadway and utility infrastructure. Thus, the Project would not physically divide an established community. Therefore, no impacts related to this issue would occur.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or adopted plan for the purpose of avoiding or mitigating an environmental effect?

No Impact. As discussed below, the Project would be substantially consistent with all of the applicable plans, policies, and regulations associated with development of the Project Site. Therefore, no impacts related to land use and planning would occur as a result of the Project.

Regional Plans

Southern California Association of Governments

SCAG functions as the Metropolitan Planning Organization for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The SCAG region encompasses a population exceeding 18 million persons in an area of more than 38,000 square miles. As the federally-designated Metropolitan Planning Organization, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality. Applicable SCAG publications are discussed below.

2020-2045 RTP/SCS

SB 375 requires MPOs such as SCAG to revise and update their RTPs and SCS, periodically. SCAG's most recent RTP/SCS is the 2020-2045 RTP/SCS, finally adopted on September 3, 2020 by SCAG's Regional Council.

The 2020-2045 RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians.

The 2020-2045 RTP/SCS outlines more than \$638 billion in transportation system investments through 2045 and was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. The 2020-2045 RTP/SCS includes strategies for accommodating projected population, household and employment growth in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices with a reduced dependence on automobiles and an increase growth in walkable, mixed-use communities and HQTAs and by encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region.

2020-2045 RTP/SCS Consistency Discussion

The Project's consistency with the 2020-2045 RTP/SCS is discussed on Table 3-2 in Section 3 (SCEA Criteria and Transit Priority Project Consistency Analysis). As discussed there, the Project would be substantially consistent with the 2020-2045 RTP/SCS. Therefore, impacts related to consistency with the 2020-2045 RTP/SCS would be less than significant.

South Coast Air Quality Management District

Air Quality Management Plan

The Project Site is located within the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies, including periodic updates to the AQMP, and guidance to local government about how to incorporate these strategies into their land use plans and decisions about development.

SCAG is responsible for generating the socio-economic profiles and growth forecasts on which land use, transportation, and air quality management and implementation plans are based. The growth forecasts provide the socioeconomic data used to estimate vehicle trips and VMT. Emission estimates then can be forecast by SCAQMD based on these projected estimates. Reductions in emissions due to changes in the socio-economic profile of the region are an important way of taking account of changes in land use patterns. For example, changes in jobs/housing balance induced by changes in urban form and transit-oriented development induce changes in VMT by more closely linking housing to jobs. Thus, socio-economic growth forecasts are a key component to guide the Basin toward attainment of the NAAQS.

The current AQMP establishes a comprehensive regional air pollution control program leading to the attainment of State and federal air quality standards in the Basin. In addition to setting minimum acceptable exposure standards for specified pollutants, the AQMP incorporates SCAG's growth management strategies that can be used to reduce vehicle trips and VMT, and hence air pollution. These include, for example, co-location of employment and housing, and mixed-use land patterns that allow the integration of residential and non-residential uses.

AQMP Consistency Discussion

Air quality impacts of the Project and consistency of the Project with the AQMP are discussed in response to Checklist Question III(a) (Air Quality – AQMP Consistency) of this IS/MND.

Local Plans

City of Los Angeles

General Plan

The City's General Plan, adopted December 1996 and re-adopted August 2001, provides general guidance on land use issues for the entire City. The General Plan consists of a Framework Element, a Land Use Element, and 10 citywide elements. The Framework Element of the General Plan serves as guide for the City's overall long-range growth and development policies and serves as a guide to update the community plans and the citywide elements. The citywide elements address functional topics that cross community boundaries, such as transportation, and address these topics in more detail than is appropriate in the Framework Element, which is the "umbrella document" that provides the direction and vision necessary to bring cohesion to the City's overall general plan. The Framework Element provides a conceptual relationship between land use and transportation and provides guidance for future updates to the various elements of the General Plan, but does not supersede the more detailed community and specific plans. The Land Use chapter of the Framework Element contains Long Range Land Use Diagrams that depict the generalized distribution of centers, districts, and mixed-use

boulevards throughout the City, but the community plans determine the specific land use designations. The Land Use Element of the General Plan is contained within 35 community plans.

Land Use Element Consistency Discussion

The Project’s consistency with the General Plan Framework Element is discussed on Table XI-1. As shown, the Project would be substantially consistent with the Framework Element. Therefore, Project impacts related to consistency of the Project with the Framework Element would be less than significant.

**Table XI-1
Project Consistency with Applicable Policies of the Framework Element**

Goals, Objectives, and Policies	Project Consistency
LAND USE	
<i>Distribution of Land</i>	
<p><i>GOAL 3A</i> <i>A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.</i></p>	
<p><i>Objective 3.1</i> <i>Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.</i></p>	
<p>Policy 3.1.1 Identify areas on the Long-Range Land Use Diagram and in the community plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.</p>	<p>Consistent. The Project includes development of the Project Site with a mixed-use building with 362 dwelling units, 41 of which would be restricted to Very Low Income Households. The unit types would consist of 126 studios, 110 one-bedrooms, and 126 two-bedrooms. Additionally, the Project would include neighborhood-serving restaurant uses. Thus, the Project would help to serve the City’s land use needs.</p>
<p>Policy 3.1.2 Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in</p>	<p>Consistent. As discussed in response to Checklist Topics XV (Public Services), XVII (Transportation), and XIX (Utilities and Service Systems), existing public</p>

**Table XI-1
Project Consistency with Applicable Policies of the Framework Element**

Goals, Objectives, and Policies	Project Consistency
the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.	infrastructure and services would be adequate to accommodate the Project.
Objective 3.2 <i>Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.</i>	
Policy 3.2.1 Provide a pattern of development consisting of distinct districts, centers, boulevards, and neighborhoods that are differentiated by their functional role, scale, and character. This shall be accomplished by considering factors such as the existing concentrations of use, community-oriented activity centers that currently or potentially service adjacent neighborhoods, and existing or potential public transit corridors and stations.	Consistent. The Project includes development of 362 multi-family residential units, including 41 Very Low Income units, and neighborhood-serving restaurant uses at the Project Site near concentrations of employment, shopping, and transit along the Sepulveda Boulevard corridor and surrounding area. The Project Site is surrounded by a mix of commercial and residential uses and as such, the Project would fit within the pattern of land use development in the area.
Policy 3.2.3 Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	Consistent. The Project includes development of the Project Site with a mixed-use building with 362 dwelling units. The Project would include 214 bicycle parking spaces. Further, the Project would improve the sidewalks surrounding the Project Site that would allow for better pedestrian access to the surrounding area. Thus, the Project would fit into the existing pattern of land use development in the area that allows for pedestrian/bicycle access.
Objective 3.3 <i>Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.</i>	
Policy 3.3.1 Accommodate projected population and employment growth in	Consistent. As discussed in detail in response to Checklist Question XIV (a)

**Table XI-1
Project Consistency with Applicable Policies of the Framework Element**

Goals, Objectives, and Policies	Project Consistency
<p>accordance with the Long-Range Land Use Diagram and forecasts in Table 2-2 (see Chapter 2: <i>Growth and Capacity</i>), using these in the formulation of the community plans and as the basis for the planning for and implementation of infrastructure improvements and public services.</p>	<p>(Population and Housing – Unplanned Population Growth), the Project’s population and housing growth would fall within the forecasted growth for the City. Thus, the Project would not represent substantial or significant unplanned growth as compared to projected growth for the City.</p>
<p>Policy 3.3.2 Monitor population, development, and infrastructure and service capacities within the City and each community plan area, or other pertinent service area.</p>	<p>As discussed in response to Checklist Question XIV (a) (Population and Housing – Unplanned Population Growth), the Project’s population and housing growth would fall within the forecasted growth for the City. Thus, the Project would not represent substantial or significant unplanned growth as compared to projected growth for the City.</p> <p>As discussed in response to Checklist Topics XV (Public Services), XVII (Transportation), and XIX (Utilities and Service Systems), existing public infrastructure and services would be adequate to accommodate the Project.</p>
<p>Objective 3.4 <i>Encourage new multi-family residential, retail commercial, and office development in the City’s neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.</i></p>	
<p>Policy 3.4.1 Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City’s major boulevards, referred to as districts, centers, and</p>	<p>Consistent. The Project includes development of 362 multi-family residential units, with 41 Very Low Income units, and neighborhood-serving restaurant uses on a site located in the Sepulveda Boulevard corridor. The Project Site area is served by Metro Local Lines 108 and 110, CCB Lines 2, 3, 6, and CCB Rapid Line 6. The Project would not impede on any existing residential neighborhoods.</p>

**Table XI-1
Project Consistency with Applicable Policies of the Framework Element**

Goals, Objectives, and Policies	Project Consistency
mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.	
<i>Source: City of Los Angeles General Plan Framework Element, adopted December 11, 1996, re-adopted August 8, 2001.</i>	

Westchester-Playa del Rey Community Plan

The Project Site is located within the boundaries of the Westchester-Playa del Rey Community Plan.

The Westchester-Playa del Rey Community Plan Area (CPA) is situated in the western portion of the Los Angeles Basin, adjacent to the Los Angeles International Airport (LAX), located south of the communities of Palms-Mar Vista-del Rey and Venice; adjacent to the cities of Culver City, Inglewood, El Segundo; and the Los Angeles County unincorporated areas of Del Aire, Ladera Heights, Lennox, and Marina del Rey. The Westchester - Playa del Rey CPA is generally bounded by Centinela Avenue, La Brea Avenue, the City of Los Angeles boundaries with unincorporated County of Los Angeles, the City of Inglewood, the City of El Segundo, Dockweiler State Beach, Ballona Creek, Bay Street and Jefferson Boulevard. The Westchester-Playa del Rey CPA contains approximately 5,766 net acres. Most of the topography is level except for an amount of varied, hillside terrain located in the northwest and west portions of the CPA where there are significant coastal bluffs. The land use consists primarily of low to low-medium density residential uses, with commercial uses concentrated near the transit corridors of Lincoln Boulevard, Sepulveda Boulevard, and Century Boulevard. Westchester-Playa del Rey experienced most of its development after World War II to meet the expanding population of the Los Angeles area. Residential land uses account for approximately 2,357 net acres with approximately 22,794 dwelling units, of which 49 percent are multi-family units. Most of the housing stock is more than 40 years of age. Concentrations of multi-family residential uses can be found near La Tijera Boulevard and Manchester Avenue.

**Table XI-2
Project Consistency with the Westchester-Playa del Rey Community Plan**

Policies	Consistency Discussion
<p><u>Residential</u></p> <p>GOAL 1 PROVIDE A SAFE, SECURE, AND HIGH QUALITY RESIDENTIAL ENVIRONMENT FOR ALL ECONOMIC, AGE, AND ETHNIC SEGMENTS OF THE WESTCHESTER-PLAYA DEL REY COMMUNITY.</p> <p><i>Objective 1-1 Provide for the preservation of existing quality housing, and for the development of new housing to meet the diverse economic and physical needs of the existing residents and expected new residents in the Westchester-Playa del Rey Community Plan Area to the year 2025.</i></p>	
<p>Policy 1-1.1 Protect existing stable single family and low density residential neighborhoods, such as Kentwood, from encroachment by higher density residential uses and other uses that are incompatible as to scale and character, or would otherwise diminish quality of life.</p>	<p>Consistent. The Project includes development of mixed residential and commercial uses on Sepulveda Boulevard and not adjacent to any residential neighborhoods. Thus, the Project would not encroach on any existing residential neighborhoods.</p>
<p>Policy 1-1.2 The City should promote neighborhood preservation, particularly in existing single family neighborhoods, as well as in areas with existing multiple family residences.</p>	<p>Consistent. The Project includes development of mixed residential and commercial uses on Sepulveda Boulevard and not adjacent to any residential neighborhoods. Thus, the Project would not encroach on any existing residential neighborhoods.</p>
<p>Policy 1-1.3 Provide for adequate Multiple Family residential development.</p>	<p>Consistent. The Project includes development of the Project Site with a mixed-use building with 362 dwelling units, 41 of which would be restricted to Very Low Income Households. The unit types would consist of 126 studios, 110 one-bedrooms, and 126 two-bedrooms.</p>
<p><i>Objective 1-2 Locate housing near commercial centers, public facilities, and bus routes and other transit services, to reduce vehicular trips and congestion and increase access to services and facilities.</i></p>	
<p>Policy 1-2.1 Locate higher residential densities near commercial centers, public facilities, bus routes and other transit services.</p>	<p>Consistent. The Project includes development of 362 multi-family residential units, including 41 Very Low</p>

**Table XI-2
Project Consistency with the Westchester-Playa del Rey Community Plan**

Polices	Consistency Discussion
	Income units, and neighborhood-serving restaurant uses at the Project Site near concentrations of employment, shopping, and transit along the Sepulveda Boulevard corridor and surrounding area. The Project Site area is served by Metro Local Lines 108 and 110, CCB Lines 2, 3, 6, and CCB Rapid Line 6.
<i>Objective 1-4 Provide affordable housing and increased accessibility to more population segments, especially students, the disabled and senior citizens.</i>	
Policy 1-4.1 Promote greater individual choice in type, quality, price and location of housing.	Consistent. The Project includes development of 362 multi-family residential units, including 41 Very Low Income units, and neighborhood-serving restaurant uses at the Project Site near concentrations of employment, shopping, and transit along the Sepulveda Boulevard corridor and surrounding area.
Policy 1-4.2 Promote the development of housing for persons of low to moderate income within the community.	Consistent. The Project includes development of 362 multi-family residential units, including 41 Very Low Income units, and neighborhood-serving restaurant uses at the Project Site near concentrations of employment, shopping, and transit along the Sepulveda Boulevard corridor and surrounding area.
Policy 1-4.3 Ensure that new housing opportunities minimize displacement of residents.	Consistent. The Project Site does not contain any existing housing. Thus, the Project would not displace any residents.
Policy 1-4.4 Encourage multiple family residential and mixed use development in commercial zones, pedestrian oriented areas, and near transit corridors.	Consistent. The Project includes development of mixed residential and commercial uses on a site that is zoned C4, which allows for the proposed uses. The Project Site area is served by Metro Local Lines 108 and 110, CCB Lines 2, 3, 6, and CCB Rapid Line 6.

**Table XI-2
Project Consistency with the Westchester-Playa del Rey Community Plan**

Polices	Consistency Discussion
<i>Objective 1-5 Protect established residential neighborhoods from incompatible uses, including multiple family residential uses of substantially higher density, to preserve the residential character of these neighborhoods and protect residents from adverse environmental impacts caused by such uses.</i>	
Policy 1-5.1 Where possible, do not locate incompatible land uses, including higher density multiple residential uses, within or in close proximity to lower density residential neighborhoods, except where there are adequate buffers, transitional land uses, etc.	Consistent. The Project Site is located on Sepulveda Boulevard and not adjacent to any residential neighborhoods.
Commercial	
GOAL 2 ENCOURAGE A STRONG AND COMPETITIVE COMMERCIAL SECTOR THAT PROMOTES ECONOMIC VITALITY AND SERVES THE NEEDS OF THE WESTCHESTER-PLAYA DEL REY COMMUNITY THROUGH SAFE, ACCESSIBLE, AND WELL-DESIGNED COMMERCIAL DISTRICTS, WHILE PRESERVING THE HISTORIC AND CULTURAL CHARACTER OF THE COMMUNITY.	
Objective 2-1 Preserve and strengthen viable commercial development in the community, and provide additional opportunities for new commercial development and services within existing commercial areas.	
Policy 2-1.2 Protect existing and planned commercially zoned areas, particularly within designated Commercial Centers, from encroachment by stand-alone residential development.	Consistent. The Project includes development of mixed residential and commercial uses on site that is zoned and designated for such uses. The Project would incorporate an existing restaurant that is located on the site into the Project and would maintain its use.
<u>Recreational and Park Facilities</u>	
GOAL 4 PROVIDE ADEQUATE RECREATION AND PARK FACILITIES TO MEET THE NEEDS OF RESIDENTS IN THE WESTCHESTER-PLAYA DEL REY COMMUNITY PLAN AREA.	
Objective 4-1 To conserve, maintain and better use existing recreation and park facilities.	
Policy 4-1.1 Preserve and improve the existing recreational facilities and park spaces.	Consistent. The Project would not affect any existing recreational facilities or park space. Additionally, as discussed in

**Table XI-2
Project Consistency with the Westchester-Playa del Rey Community Plan**

Polices	Consistency Discussion
	response to Checklist Question XV(d) (Public Services – Parks), in accordance with Ordinance 184,505, the Project Applicant shall be required to dedicate land or to pay a fee for the purpose of developing park and recreational facilities to mitigate the Project’s demand for parks and recreational facilities.
Policy 4-1.3 Encourage the provision of adequate parking to serve parks and other ancillary recreational facilities.	Consistent. As discussed in response to Checklist Question XV(d) (Public Services – Parks), in accordance with Ordinance 184,505, the Project Applicant shall be required to dedicate land or to pay a fee for the purpose of developing park and recreational facilities to mitigate the Project’s demand for parks and recreational facilities.
<u>Police Protection</u>	
GOAL 8 CONTINUE TO PROVIDE THE WESTCHESTER-PLAYA DEL REY COMMUNITY WITH ADEQUATE POLICE FACILITIES AND SERVICES TO PROTECT ITS RESIDENTS FROM CRIMINAL ACTIVITY, REDUCE THE INCIDENCE OF CRIME, AND PROVIDE OTHER NECESSARY LAW ENFORCEMENT SERVICES.	
Objective 8-1 <i>Provide adequate police facilities, personnel and protection to correspond with existing and future population and service demands.</i>	
Policy 8-1.1 Consult with the LAPD in the review of development projects and land use changes to determine law enforcement needs and requirements.	Consistent. As part of the preliminary review of the Project, the LAPD has been consulted and has provided input on the Project design.
Policy 8-1.2 Provide adequate lighting around residential, commercial and industrial buildings, and park, school, and recreational areas to improve security.	Consistent. The Project would provide lighting in accordance with LAMC and LAPD requirements.
Policy 8-1.3 Ensure that landscaping around buildings does not impede visibility and provide hidden places which could foster criminal activity.	Consistent. The Project would include landscaping in accordance with LAMC and LAPD requirements.

**Table XI-2
Project Consistency with the Westchester-Playa del Rey Community Plan**

Policies	Consistency Discussion
<u>Fire Protection</u>	
GOAL 9 PROTECT THE RESIDENTS OF THE WESTCHESTER - PLAYA DEL REY COMMUNITY AREA THROUGH A COMPREHENSIVE FIRE AND LIFE SAFETY PROGRAM.	
Objective 9-1 <i>Maintain fire facilities and protective services that are sufficient for the existing and future population and land use.</i>	
Policy 9-1.1 Coordinate with the City of Los Angeles Fire Department during the review of significant development projects and General Plan amendments affecting land use to determine the impacts on service demands.	Consistent. As part of preparation of the preliminary review of the Project, the LAFD has been consulted and has provided input on the Project design.
<i>Source: City of Los Angeles, Westchester-Playa del Rey Community Plan, April 13, 2004.</i>	

Cumulative Impacts

As discussed previously, the Project would not result in any inconsistencies with any of the applicable plans, policies, or regulations associated with development of the Project Site. The City would assess the consistency of the related projects that are located in the City of Los Angeles with all applicable plans, policies, and regulations associated with those projects, individually. Regardless of any potentially inconsistencies the related projects may result in, because the Project would not result in any inconsistencies, the Project would not have the potential to contribute to any cumulative inconsistency impacts.

XII. 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. The Project Site is located in an urbanized part of the City. There are no known mineral resources on the Project Site or in the vicinity. Thus, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, no impacts related to issue would occur.

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. The Project Site is located in an urbanized part of the City. The Project Site is not identified as a mineral resource recovery site. Thus, the Project would not 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. Therefore, no impacts related to issue would occur.

Cumulative Impacts

As discussed previously, the Project would not result in any impacts related to mineral resources. Regardless to what degree the related projects could result in impacts related to mineral resources, because the Project would not result in any impacts related to mineral resources, the Project would not have the potential to contribute to any cumulative impacts.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

Would the project result in:

- | | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

The analysis provided below is primarily based on technical data prepared by NTEC (refer to Appendix G).

Environmental Setting

Fundamentals of Sound and Environmental Noise

Sound can be described in terms of its loudness (amplitude) and frequency (pitch). The standard unit of measurement for sound is the decibel, abbreviated dB. Because the human ear is not equally sensitive to sound at all frequencies, the A-weighted scale (dBA) is used to reflect the normal hearing sensitivity range of the human ear. Table XIII-1 provides examples of A-weighted noise levels from common sources. Although the terms “sound” and “noise” are often used synonymously, noise is commonly defined as sound that is either loud, unpleasant, unexpected, or undesired.⁴⁸ Because decibels are logarithmic units, they cannot be simply added or subtracted. For example, two cars each producing 60 dBA of noise would not produce a combined 120 dBA.

⁴⁸ California Department of Transportation (Caltrans), *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013.

**Table XIII-1
A-Weighted Decibel Scale**

Common Noise Sources	Sound Level, dBA
Near Jet Engine	130
Rock and Roll Band	110
Jet Flyover at 1,000 feet	100
Power Motor	90
Food Blender	80
Living Room Music	70
Human Voice at 3 feet	60
Residential Air Conditioner at 50 feet	50
Bird Calls	40
Quiet Living Room	30
Average Whisper	20
Rustling Leaves	10
<i>Note: These noise levels are approximations intended for general reference and informational use. They do not meet the standard required for detailed noise analysis but are provided for the reader to gain a rudimentary concept of various noise levels.</i>	
<i>Source: Cowan, James P., Handbook of Environmental Acoustics, 1993</i>	

Noise Definitions

This noise analysis discusses sound levels in terms of equivalent noise level (L_{eq}), maximum noise level (L_{max}), minimum noise level (L_{mix}), and Community Noise Equivalent Level (CNEL). Statistical descriptors (L_x) are also discussed.

Equivalent Noise Level (L_{eq})

L_{eq} represents the equivalent steady-state noise level for a stated period of time that would contain the same acoustic energy as the fluctuating, time-varying noise level of that same period. For example, the L_{eq} for one hour is the energy average noise level for that hour. L_{eq} can be thought of as a continuous noise level for a certain period that is equivalent in acoustic energy content to a fluctuating noise level of that same period. In this report L_{eq} is expressed in units of dBA.

Maximum Noise Level (L_{max})

L_{max} represents the highest instantaneous noise level of a specified time period.

Minimum Noise Level (L_{mix})

L_{min} represents the lowest instantaneous noise level of a specified time period.

Community Noise Equivalent Level (CNEL)

CNEL is a weighted noise measurement scale of average sound level during a 24-hour period. Due to increased noise sensitivities during evening and night hours, human reaction to sound between 7:00 P.M. and 10:00 P.M. is as if it were actually 5 dBA higher than had it occurred between 7:00 A.M. and 7:00 P.M. From 10:00 P.M. to 7:00 A.M., humans perceive sound as if it were 10 dBA higher. To account for these sensitivities, CNEL penalizes evening noise levels between 7:00 P.M. and 10:00 P.M. by an additional 5 dBA and nighttime noise levels between 10:00 P.M. and 7:00 A.M. by an additional 10 dBA. Because of this, 24-hour CNEL figures are always higher than their corresponding 24-hour L_{eq} .

Statistical Descriptor (L_x)

L_x is used to represent the noise level exceeded “X” percent of a specified time period. For example, L_{90} represents the noise level that is exceeded 90 percent of a specified time period. L_{90} is commonly used to represent ambient or background steady-state noise levels.⁴⁹

Effects of Environmental Noise

The degree to which noise can impact an environment ranges from levels that interfere with speech and sleep to levels that can cause adverse health effects. Most human response to noise is subjective. Factors that influence individual responses may include the intensity, frequency, and pattern of noise; the amount of background or existing noise present; and the nature of work or human activity that is exposed to intruding noise.

According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of 75 dBA or less, even after continuous and repeated exposure, are unlikely to cause hearing loss.⁵⁰ The World Health Organization (WHO) reports that adults should not be exposed to sudden “impulse” noise events of 140 dB or greater. For children, this limit is 120 dB.⁵¹

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping environments, the WHO recommends that continuous interior noise levels should not exceed 30 dBA L_{eq} and that individual noise events of 45 dBA or higher be limited.⁵²

⁴⁹ Caltrans, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013.

⁵⁰ National Institute of Health, National Institute on Deafness and Other Communication. www.nidcd.nih.gov/health/noise-induced-hearing-loss.

⁵¹ World Health Organization, *Guidelines for Community Noise*, 1999.

⁵² *Ibid.*

Some epidemiological studies have shown a weak association between long-term exposure to noise levels of 65 to 70 dBA L_{eq} or greater and cardiovascular effects, including ischaemic heart disease and hypertension. However, at this time, the relationship is largely inconclusive.

It is generally accepted that people with normal hearing sensitivity can barely perceive a 3 dBA change in noise levels, though if changes occur to the character of a sound (i.e., changes to the frequency content), then changes less than 3 dBA may be more noticeable.⁵³ Changes of 5 dBA may be readily perceptible, and changes of 10 dBA are perceived as a doubling in loudness.⁵⁴ However, few people are highly annoyed by daytime noise levels below 55 dBA.⁵⁵

Loud noises, such as those from construction activities, can interfere with peoples' abilities to effectively communicate via speech, as well as other activities, resulting in annoyance or inconvenience. The EPA has determined that a home interior noise level of 45 dBA L_{eq} generally protects speech and communication by providing 100 percent intelligibility of speech sounds.⁵⁶ Other common daily activities that may be disrupted by elevated interior noise levels include watching television, listening to music, or activities requiring concentration (such as reading). The EPA has surmised that, given the preservation of an indoor noise level associated with 100 percent speech intelligibility, the average community reaction is not evident and "7 dBA below levels associated with significant complaints and threats of legal action." Any complaints and annoyance are dependent on "attitude and other non-level related factors."

Noise Attenuation

Generally speaking, noise levels decrease, or "attenuate," as distances from noise sources to receivers increases. For each doubling of distance, noise from stationary or small, localized sources, commonly referred to as "point sources," may attenuate at the rate of 6 dBA for each doubling of distance. This attenuation is referred to as the inverse square law. For example, if a point source emits a noise level of 80 dBA at a reference distance of 50 feet its noise level would be approximately 74 dBA at a distance of 100 feet, 68 dBA at a distance of 200 feet, etc. Noise emitted by "line" sources, such as highways, attenuates at the rate of 3 dBA for each doubling of distance.⁵⁷

Factors such as ground absorption and atmospheric effects may also affect the propagation of noise. In particular, ground attenuation by non-reflective surfaces such as

⁵³ Caltrans, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013.

⁵⁴ *Ibid.*

⁵⁵ World Health Organization, *Guidelines for Community Noise*, 1999.

⁵⁶ EPA, *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety*, 1974.

⁵⁷ Caltrans, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013.

soft dirt or grass may contribute to increased attenuation rates of up to an additional 8-10 dBA per doubling of distance.⁵⁸

Noise is most audible when traveling by direct line of sight, an unobstructed visual path between a noise source and a receiver. Barriers that break the line of sight between noise sources and receivers, such as walls and buildings, can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. In cases where the noise path from source to receiver is direct but grazes the top of a barrier, noise attenuation of up to 5 dBA may still occur.⁵⁹

Fundamentals of Vibration

Vibration is an oscillatory motion that can be described in terms of displacement, velocity, and acceleration.⁶⁰ Unlike noise, vibration is not a common environmental issue, as it is unusual for vibration from vehicle sources to be perceptible. Common sources of vibration may include trains, construction activities, and certain industrial operations.

Vibration Definitions

This analysis discusses vibration in terms of Peak Particle Velocity (PPV):

Peak Particle Velocity (PPV)

PPV is commonly used to describe and quantify vibration impacts to buildings and other structures. PPV levels represent the maximum instantaneous peak of a vibration signal and are generally measured in inches per second (in/sec).⁶¹

Effects of Vibration

High levels of vibration may cause damage to buildings or even physical personal injury. However, vibration levels rarely affect human health outside the personal operation of certain construction equipment or industrial tools. Background vibration in residential areas is usually not perceptible, and perceptible indoor vibrations are generally caused by sources within buildings themselves, such as slamming doors or heavy footsteps. Vibration from traffic on smooth roadways is rarely perceptible, even from larger vehicles such as buses or trucks.⁶² The threshold of human perception of vibration is approximately 0.01-0.02 in/sec PPV.⁶³

⁵⁸ *Ibid.*

⁵⁹ *Ibid.*

⁶⁰ *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.*

⁶¹ *Ibid.*

⁶² *Caltrans, Transportation and Construction Vibration Guidance Manual, September 2013.*

⁶³ *Ibid.*

Regulatory Framework

Federal

Currently, no federal noise standards regulate environmental noise associated with temporary construction activities or the long-term operations of development projects. As such, both temporary and long-term noise impacts resultant from the Project would be largely regulated or otherwise evaluated by State and City of Los Angeles standards designed to protect public well-being and health.

State

2017 General Plan Guidelines

The State of California's 2017 General Plan Guidelines propose county and city standards for acceptable exterior noise levels based on land use. These standards are incorporated into land use planning processes to prevent or reduce noise and land use incompatibilities. The State's suggested compatibility considerations between various land uses and exterior noise levels are not regulatory in nature, but recommendations intended to aid communities in determining their noise-acceptability standards.

City of Los Angeles

General Plan Noise Element

The City of Los Angeles General Plan contains a Noise Element that includes objectives and policies intended to guide the control of noise to protect residents, workers, and visitors. Its primary goal is to manage long-term noise impacts to preserve acceptable noise environments for all types of land uses. The Noise Element contains no quantitative or other thresholds of significance for evaluating a project's noise or vibration impacts. However, the Noise Element does contain a land use and noise compatibility table, which is shown on Table XIII-2. Policy P16 of the Noise Element instructs to use, "as appropriate," this table "or other measures that are acceptable to the city, to guide land use and zoning reclassification, subdivision, conditional use and use variance determinations and environmental assessment considerations, especially relative to sensitive uses, as defined by this chapter..."⁶⁴ "Noise sensitive" uses are defined as "single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodgings and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves, and parks."⁶⁵ The Noise Element further instructs that the table is designed "to help guide determination of appropriate land use and mitigation measures vis-à-vis existing or anticipated ambient noise levels."

⁶⁴ *Noise Element of the Los Angeles City General Plan, February 1999.*

⁶⁵ *Ibid.*

**Table XIII-2
City of Los Angeles Noise Element – Guidelines for Noise Compatible Land Use**

Land Use Category	Day-Night Average Exterior Sound Level (CNEL dB)						
	50	55	60	65	70	75	80
Residential Single Family, Duplex, Mobile Home	A	C	C	C	N	U	U
Residential Multi-Family	A	A	C	C	N	U	U
Transient Lodging, Motel, Hotel	A	A	C	C	N	U	U
School, Library, Church, Hospital, Nursing Home	A	A	C	C	N	N	U
Auditoriums, Concert Halls, Amphitheatres	C	C	C	C/N	U	U	U
Sports Arena, Outdoor Spectator Sports	C	C	C	C	C/U	U	U
Playground, Neighborhood Park	A	A	A	A/N	N	N/U	U
Golf Course, Riding Stable, Water Recreation, Cemetery	A	A	A	A	N	A/N	U
Office Building, Business, Commercial, Professional	A	A	A	A/C	C	C/N	N
Industrial, Manufacturing, Utilities, Agriculture	A	A	A	A	A/C	C/N	N

A = Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

C = Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditioning will normally suffice.

N = Normally Unacceptable - New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

U = Clearly Unacceptable - New construction or development should generally not be undertaken.

Source: Noise Element of the Los Angeles City General Plan – Exhibit I

Los Angeles Municipal Code

The LAMC contains a number of regulations that would apply to the Project’s temporary construction activities and long-term operations.

Section 112.03 “Construction Noise” instructs that “Noise due to construction or repair work shall be regulated as provided by Section 41.40 of this Code.” Section 41.40(a) would prohibit the Project’s construction activities from occurring between the hours of 9:00 P.M. and 7:00 A.M., Monday through Friday. Subdivision (c) would further prohibit such activities from occurring before 8:00 A.M. or after 6:00 P.M. on any Saturday, or on any Sunday or national holiday.

SEC.41.40. NOISE DUE TO CONSTRUCTION, EXCAVATION WORK—WHEN PROHIBITED

- (a) *No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power drive drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.*
- (c) *No person, other than an individual homeowner engaged in the repair or construction of his single-family dwelling shall perform any construction or repair work of any kind upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter I of this Code, or perform such work within 500 feet of land so occupied, before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair, or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specific...*

Section 112.05 of the LAMC establishes noise limits for powered equipment and hand tools operated within 500 feet of residential zones. Of particular importance is subdivision (a), which institutes a maximum noise limit of 75 dBA at 50 feet for the types of construction vehicles and equipment that would be required for the Project’s construction. However, the LAMC notes that these limitations would not necessarily apply if it can be proven that compliance would be technically infeasible despite the use of noise-reducing means or methods.

SEC.112.05 MAXIMUM NOISE LEVEL OF POWERED EQUIPMENT OR POWERED HAND TOOLS

Between the hours of 7:00 A.M. and 10:00 P.M., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:

- (a) 75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;*
- (b) 75 dBA for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;*
- (c) 65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.*

Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment.

Section 112.01 of the LAMC would prohibit any amplified noises, especially those from outdoor sources (e.g., outdoor speakers, stereo systems, etc.) from exceeding the ambient noise levels of adjacent properties by more than 5 dBA.

SEC.112.01 RADIOS, TELEVISION SETS, AND SIMILAR DEVICES

- (a) It shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area.*
- (b) Any noise level caused by such use or operation which is audible to the human ear at a distance in excess of 150 feet from the property line of the*

noise source, within any residential zone of the City or within 500 feet thereof, shall be a violation of the provisions of this section.

- (c) Any noise level caused by such use or operation which exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than five (5) decibels shall be a violation of the provisions of this section.

Federal Transit Administration (FTA)

For the evaluation of construction-related vibration impacts, Federal Transit Administration (FTA) guidelines and recommendations are used given the absence of applicable federal, County, or City standards specific to temporary construction activities.

Though not regulatory in nature, the FTA has established vibration impact criteria for buildings and other structures, as building and structural damage is generally the foremost concern when evaluating the impacts of construction-related vibration. Table XIII-3 shows the FTA’s vibration guidelines for building and structural damage.

**Table XIII-3
FTA Construction Vibration Damage Criteria**

Building Category	PPV (in/sec)
I. Reinforced concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
<i>Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.</i>	

Existing Conditions

Project Site

The northern portion of the Project Site is currently improved with a single-story, multi-tenant commercial plaza and a single-story, multi-tenant industrial building, both with associated surface parking. The southern portion of the site is improved with an approximately 7,760 square-foot restaurant and its associated surface parking. This restaurant use would be preserved as part of the Project. However, its existing surface parking would be removed.

Noise-Sensitive Receptors

The Project is located in a neighborhood with a mixture of commercial, industrial, and residential uses. The closest noise-sensitive receptors to the Project Site are as follows:

- Extended Stay America Hotel: This receptor is located at 6531 S. Sepulveda Boulevard, approximately 70 feet south of the Project Site.
- Sepulveda Boulevard Residences: This receptor consists of two multi-family residential uses that are located south of the Project along Sepulveda Boulevard. The closest multi-family residential use, Hanover West LA (6711 S. Sepulveda Blvd.), is located approximately 350 feet south of the Project Site. An additional multi-family residential use is currently under construction at 6733 S. Sepulveda Boulevard and would likely be leased and occupied prior to the start of the Project's construction. This future receptor is located approximately 465 feet south of the Project.
- Single-Family Residences: This receptor consists of single-family residences located along Arizona Avenue and Riggs Place on a bluff to the south of the Project Site. The closest residential structure associated with this receptor is a home located at 6868 Arizona Avenue, approximately 680 feet south of the Project Site. However, the backyards of some Riggs Place residences are located approximately 520 feet south of the Project Site.

Other noise-sensitive receptors are located at greater distances from the Project and would experience lesser noise impacts than these receptors. As such, the following analysis focuses on the Extended Stay America Hotel, Sepulveda Boulevard Residences, and Single-Family Residences receptors in order to assess the significance of the Project's potential noise impacts.

A map showing the location of the Project and nearby sensitive receptors is included on page 1 of Appendix G.

Existing Ambient Noise Conditions

On May 13, 2021, noise measurements were obtained at four locations near the Project Site to aid in the characterization of daytime ambient noise conditions surrounding the Project and its nearest sensitive receptors. At locations of sensitive receptors the primary source of noise levels was vehicular traffic along nearby roadways, though secondary noises from surrounding commercial uses and residential landscaping activities were intermittently audible. The measured noise levels are shown on Table XIII-4.

**Table XIII-4
Existing Noise Levels**

Noise Measurement Location	Sound Level (dBA L_{eq})
1. Arizona Ave. – Gap between industrial district and residential neighborhood.	50.9
2. Near intersection of Centinela Ave. and Arizona Ave.	65.4
3. Sepulveda Blvd.	68.4
4. Arizona Ave. – Northern terminus near 6868 Arizona Ave.	55.7
<i>Source: NTEC, 2021. Refer to Appendix G.</i>	

a) Generation of a substantial temporary or permanent increase in ambient noise levels in vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant With Mitigation Incorporated. The Project would generate noise during the construction and operational phases. Below is an analysis of the Project's noise levels and whether these levels would result in a substantial temporary or permanent increase in ambient noise levels in vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Construction

Construction Noise Threshold

Construction noise impacts could be considered significant if the following occurred:

- Construction activities lasting more than one day would exceed existing ambient exterior sound levels by 10 dBA (hourly L_{eq}) or more at a noise-sensitive use;
- Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA (hourly L_{eq}) or more at a noise-sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise-sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or at any time on a Sunday.

Construction Noise Impacts

On-Site Construction Activities

Project construction would occur over an estimated 41 months. Construction would be permitted between the hours of 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with Section 41.40(a) of the LAMC. On Saturdays, construction activities would be permitted to occur between 8:00 A.M. and 6:00 P.M.

Noise from demolition and grading activities is typically the foremost concern when evaluating a project's construction noise impact, as these activities often require extensive use of heavy-duty, diesel-powered earthmoving equipment, which are the loudest pieces of construction equipment. This analysis assesses noise impacts that may result from the Project's demolition and grading phases. The analysis also assesses noise impacts associated with the Project's relocation of sewer infrastructure, which would require trenching and other construction activities to take place off-site within the Sepulveda Boulevard and Centinela Avenue right of ways.

Sewer Infrastructure Relocation

To allow for development of the Project, a new 8-inch sewer line would be installed in Sepulveda Boulevard, traveling north to Centinela Avenue. From here, the line would travel northwest under Centinela Avenue to reconnect to an existing sewer line at the intersection of Centinela Avenue and Arizona Avenue. Installation of the new sewer line would require trenching along Sepulveda Boulevard and Centinela Avenue, placing new sewer pipes and constructing new manholes, backfilling the trench, and then re-paving the roadway surface. Digging and later backfilling the trench would require extensive activities from either an excavator or a backhoe. Excavators can produce noise levels of 75.9 dBA L_{eq} at 50 feet when performing work cycles; backhoes can similarly produce noise levels of 75.8 dBA L_{eq} at 50 feet when performing work cycles. Either vehicle would operate in a relatively stationary position while performing work cycles associated with the digging and backfilling of the sewer line trench. This fixed positioning means that, at times, an excavator or a backhoe may operate rather continuously in a set position at minimum or reduced noise source-to-receptor distances. However, neither an excavator nor a backhoe would work at exactly the minimum receptor distances for the entire duration of sewer infrastructure relocation activities. Excavator or backhoe work would move along the path of the proposed sewer trench from hour to hour and day to day, and noise levels at receptors would fluctuate accordingly. Nevertheless, noise impacts from excavator or backhoe usage during the Project's sewer infrastructure relocation phase have been conservatively modeled by assuming that an entire workday's operations would occur at fixed, reduced noise source-to-receptor distances.

Table XIII-5 shows the estimated noise impacts that would result from excavator or backhoe usage during the Project's sewer infrastructure relocation phase. As shown, noise increases due to excavator or backhoe usage would be below the 5 dBA L_{eq}

threshold of significance for daytime construction activities lasting more than 10 days in a three-month period at all receptors.⁶⁶

**Table XIII-5
Construction Noise Levels – Sewer Infrastructure Relocation**

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
<i>Equipment: Excavator or Backhoe</i>				
Extended Stay America Hotel	59.7	68.4	68.9	0.5
Sepulveda Boulevard Residences	52.6	68.4	68.5	0.1
Single-Family Residences	37.8	55.7	55.8	0.1
<i>Source: NTEC, 2021. Refer to Appendix G.</i>				

Demolition

Demolition would involve the removal of the majority of the site’s existing improvements, which include structures, paved areas (i.e., asphalt parking areas and a driveway), and any slab foundations. The bulk of demolition activity would be characterized by an excavator demolishing site features and depositing debris into haul trucks or dumpsters. Loaders would assist by removing asphalt surfaces and depositing asphalt and other demolition debris in haul trucks or dumpsters. As noted earlier, excavators can produce maximum noise levels of 75.9 dBA L_{eq} at 50 feet when performing work cycles, and they often operate in relatively stationary positions while doing so. This fixed positioning means that, at times, an excavator may operate rather continuously in a set position at a minimum or reduced Project-to-receptor distance. However, an excavator would not work at exactly the minimum Project-to-receptor distances for the entire duration of demolition activities; excavator work would move across the approximate two-acre construction site from hour to hour and day to day, and noise levels at receptors would fluctuate accordingly. Loaders can produce noise levels of 72.4 dBA L_{eq} when performing work cycles, and loader operations are more mobile in nature. As a result, loaders would not work at exactly the minimum Project-to-receptor distances for any appreciable amount of time. Loader operations would move about the site, and noise levels at receptors would fluctuate accordingly. Despite the fact that the required excavator and loaders would not operate continuously at minimum Project-to-receptor distances, the noise impacts from

⁶⁶ *Note: As no sewer infrastructure relocation-related construction activities would occur within 500 feet of any residential zones, LAMC Section 112.05 would not apply to this construction phase.*

these vehicles' usage have been conservatively modeled by assuming that an entire workday's operations would occur at fixed, reduced source-to-receptor distances.

Table XIII-6 shows the estimated noise levels that would result from excavator and loader usage during the Project's demolition phase. As shown, noise increases due to excavator and loader usage could exceed the 5 dBA L_{eq} threshold of significance for daytime construction activities lasting more than 10 days in a three-month period at Sepulveda Boulevard Residences. Without mitigation, the Project's construction noise impact from demolition could be significant at the Sepulveda Boulevard Residences. However, Mitigation Measure NOISE-1 (listed below at the end of the Noise analysis) from the 2020-2045 RTP/SCS Program EIR (amended for Project specifics) has been identified for the Project that includes various measures to reduce construction noise levels, including such measures as the use of temporary noise barriers, scheduling of construction activities, proper equipment maintenance, strategic siting of equipment, etc. With implementation of Mitigation Measure NOISE-1, this impact would be reduced to less than significant.

**Table XIII-6
Construction Noise Levels – Demolition (Unmitigated)**

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
<i>Equipment: Excavator and Two Loaders</i>				
Extended Stay America Hotel	71.5	68.4	73.3	4.8
Sepulveda Boulevard Residences	58.7	50.9	59.4	8.5
Single-Family Residences	55.3	55.7	58.5	2.8
<i>Source: NTEC, 2021. Refer to Appendix G.</i>				

Grading

Grading would involve excavating approximately 30,000 cubic yards of cut soils for the Project's foundation and one subterranean parking level. An excavator would be required to excavate for the Project, and a front-end loader and bulldozer would likely be required for other various earthmoving tasks. As noted earlier, excavators can produce maximum noise levels of 75.9 dBA L_{eq} at 50 feet during work cycles, while loaders can produce maximum noise levels of 72.4 dBA L_{eq} at 50 feet. Bulldozers can produce maximum noise levels of 80.0 dBA L_{eq} when pushing dirt or other debris. Similar to the previous analysis, the noise impacts from these vehicles' usage have been conservatively modeled by assuming that an entire workday's operations would occur at fixed, reduced source-to-receptor distances.

Table XIII-7 shows the estimated noise impacts from excavator, loader, and bulldozer usage during the Project’s grading phase. As shown, noise increases due to grading activities could exceed the 5 dBA Leq threshold of significance for daytime construction activities lasting more than 10 days in a three-month period at the Extended Stay America Hotel and the Sepulveda Boulevard Residences. However, Mitigation Measure NOISE-1 (listed below at the end of the Noise analysis) from the 2020-2045 RTP/SCS Program EIR (amended for Project specifics) has been identified for the Project that includes various measures to reduce construction noise levels, including such measures as the use of temporary noise barriers, scheduling of construction activities, proper equipment maintenance, strategic siting of equipment, etc. With implementation of Mitigation Measure NOISE-1, this impact would be reduced to less than significant.

**Table XIII-7
Construction Noise Levels – Grading (Unmitigated)**

Receptor	Construction Noise Level (dBA Leq)	Existing Ambient Noise Level (dBA Leq)	New Noise Level (dBA Leq)	Increase
<i>Equipment: Excavator, Loader, and Bulldozer</i>				
Extended Stay America Hotel	78.4	68.5	75.3	6.8
Sepulveda Boulevard Residences	61.5	50.9	61.9	11.0
Single-Family Residences	58.1	55.7	60.1	4.4
<i>Source: NTEC, 2021. Refer to Appendix G.</i>				

Off-Site Construction Activities

Section 112.05 of the LAMC does not regulate off-site noise emissions from road legal trucks such as delivery vehicles, concrete mixing trucks, pumping trucks, haul trucks, and worker vehicles. However, the operations of these vehicles would still comply with the construction restrictions set forth by Section 41.40 of the LAMC.

Trucks and other construction-related vehicles would access the Project site over the course of all construction phases. During the Project’s grading phase, an estimated 1,875 loaded haul trips (or 3,750 one-way trips of both loaded and empty trucks) would be required to export roughly 30,000 cubic yards of cut soils to a regional landfill. Over the course of the Project’s 4.5-month grading phase, this is unlikely to generate more than a maximum 30 haul trips (60 one-way trips) per workday. Over an eight-hour workday, this would correspond with an average of less than eight one-way trips per hour (about one

haul trip every eight minutes). As estimated using the FHWA's TNM 2.5 software, eight haul trips per hour would be capable of generating a noise level of 54.7 dBA L_{eq} at a distance of 50 feet. This would not be capable of causing discernible noise increases along Sepulveda Boulevard, Howard Hughes Parkway, and any other roadway(s) that haul trucks might utilize, much less a 5 dBA L_{eq} increase over the course of a workday. Daytime noise levels along Sepulveda Boulevard were measured to be 68.5 dBA L_{eq} , and noise levels along Howard Hughes Parkway also are likely to exceed 60 dBA L_{eq} during daytime construction hours. Therefore the Project's noise impact from off-site construction sources would be less than significant.

Operation

On-Site Operational Noise

The Project's potential on-site operational noise sources are identified and discussed below.

Mechanical Equipment

Regulatory compliance with LAMC Section 112.02 would ultimately ensure that noise from mechanical sources such as heating, air conditioning, and ventilation systems do not increase ambient noise levels at neighboring occupied properties by more than 5 dBA. Given this regulation, distances to receptors, elevated surrounding ambient noise levels, and the relatively quiet operation of modern HVAC systems, it is unlikely that the Project's HVAC systems would be capable of increasing off-site noise levels by a discernable degree. Furthermore, many surrounding land uses, both commercial and residential, also contain rooftop-mounted HVAC equipment or noisier packaged systems. The Project's existing uses also contain rooftop-mounted HVAC equipment. Given these considerations, the Project's HVAC systems would not have a substantial effect on surrounding ambient noise conditions, nor would they introduce a new major source of noise to the location.

Pool filtering and pumping equipment would also be regulated by LAMC Section 112.02. This equipment would be enclosed in mechanical rooms located within the Project's building envelope and would not be audible at any surrounding receptors.

Auto-Related Activities

The Project would include 520 parking spaces in one subterranean, one at-grade, and two above-ground parking levels. The Project's parking facilities and the intermittent noises associated with them (e.g., doors slamming, engines starting, etc.) would have a nominal effect on surrounding exterior noise levels for a number of reasons. First, one level of Project parking would be entirely subterranean. Second, the Project features a design where the residential units would "wrap-around" the majority of the at-grade and above-grade parking levels and contain parking-related noises to within the garage

structure. Also, according to FTA equations for the prediction of parking facility noise impacts, a facility with an hourly activity of 204 vehicles (equal to the Project's maximum gross peak-hour trip generation) would be expected to result in a noise level of just 49.5 dBA L_{eq} at a reference distance of 50 feet.⁶⁷ This noise level would not contribute to discernible noise increases at nearby sensitive receptors, the nearest of which is located approximately 70 feet south of the Project. Finally, the Project Site contains dozens of existing uncovered surface parking spaces. Given that the existing surface parking lot possesses no attenuating features, such as underground parking spaces or a wrap-around design, it is possible that the Project could result in a decrease of auto-related noises as compared to the Project Site's existing use.

Amenity Space/Open Space

The primary source of noise associated with the Project's balconies and shared amenity areas would be speech/conversation from Project users. Vocal noise from speech and conversation averages between 55 and 67 dBA at a reference distance of one meter, in proportion to background noise levels.⁶⁸ Given the rapid attenuation of speech/conversation and the Project's surrounding ambient noise levels, it is unlikely that vocal noises from outdoor users would be audible at nearby sensitive receptors, let alone capable of causing or contributing to significant noise increases. The Project's balconies would be located approximately 70 feet from the nearest noise-sensitive receptor. Additionally the massing of the Project itself would fully impede any line of sight noise paths from the Project's central pool and courtyard areas to nearby sensitive receptors. Overall, reasonable use of the Project's exterior amenity spaces and other open spaces would not be expected to result in discernible noise increases at nearby sensitive receptors.

Restaurant Space

The Project's proposed 3,700 square feet of new restaurant space would be oriented towards Sepulveda Boulevard. Outdoor dining area associated with this restaurant use would thus be located in a high-noise environment that is approximately 200 feet north of the nearest sensitive receptor, which are also located along Sepulveda Boulevard and subject to similar elevated noise levels. Given these considerations, reasonable use of the Project's new outdoor dining areas and restaurant space would not have any realistic potential to result in substantial increases in surrounding exterior ambient noise levels at nearby sensitive receptors. Noise levels along Sepulveda Boulevard would continue to be dominated by this roadway's traffic.

The Project's preservation and continued operations of the existing Dinah's Family Restaurant would not constitute a change to the environment (though moving this

⁶⁷ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, September 2018.

⁶⁸ EPA, *Speech Levels in Various Noise Environments*, May 1977.

restaurant's uncovered surface parking to within a parking garage would reduce noise associated with its parking).

Overall, the Project is located along an urbanized corridor with similar existing land uses and accompanying noise sources. The Project is located near of a number of other multi-story multi-family residential buildings, and Sepulveda Boulevard contains any number of street-facing commercial uses (including the Project's existing Dinah's Family Restaurant). The Project is therefore consistent with nearby land use types and patterns, and it would not alter the noise environment of its surroundings by a substantial degree or the minimum 3 dBA CNEL increase that would represent a significant impact. As a result, the impact of the Project's on-site operational noise sources would be less than significant.

Off-Site Operational Noise

On a typical weekday, the Project is estimated to result in 1,154 net new daily trips, including 102 net new A.M. peak-hour trips and 89 net new P.M. peak-hour trips.⁶⁹ The majority of the Project's inbound and outbound trips would access and depart the Project via Arizona Avenue and Sepulveda Boulevard. As shown on Table XIII-8, the Project's maximum hourly traffic-related noise levels along Sepulveda Boulevard are estimated to be well-below noise levels associated with this roadway, which were measured to be in excess of 65 dBA L_{eq} during an off-peak traffic period; roadside noise levels during peak travel times would likely be greater than this measured level. As a result, the Project's traffic-related noise levels, which are estimated to be no greater than 52.5 dBA L_{eq} for Sepulveda Boulevard, would have no potential to increase noise levels along this roadway by greater than the minimum 3 dBA CNEL increase that would represent a significant impact. Regarding Arizona Avenue, this roadway segment to the west of the Project contains mainly commercial uses and no roadside noise-sensitive receptors. The Project's maximum hourly traffic-related noise levels along Arizona Avenue, which are estimated to be no greater than 52.6 dBA L_{eq} , would not cause or contribute to "normally unacceptable" or "clearly unacceptable" ambient noise levels of 75 dBA CNEL or greater for commercial uses along this roadway, as per the City's "Guidelines for Noise Compatible Land Use" (refer to Table XIII-2). As Project-related traffic would not cause roadside noise levels to increase by a minimum 3 dBA CNEL to or within a receiving land uses "normally unacceptable" or "clearly unacceptable" noise and land use compatibility category, nor would Project-related traffic result in a 5 dBA or greater noise level increase to any roadside sensitive receptor, the Project's off-site operational noise impact from its related traffic generation would be less than significant.

⁶⁹ LADOT Transportation Assessment Memorandum of Understanding and Linscott, Law & Greenspan, Engineers, per ITE 10th ed. Methodology. Project would generate 1,062 net new daily trips per the City's VMT Calculator version 1.3. For purposes of conservative analysis, the higher daily trip number identified by the ITE 10th ed. methodology was used to assess off-site operational noise.

**Table XIII-8
Project-Related Traffic Noise Levels**

Location	Noise Level – dBA L _{eq}	
	A.M. Peak Hour	P.M. Peak Hour
Sepulveda Blvd., S of Project – 50 feet from centerline	52.5	50.4
Arizona Ave., W of Project – 30 feet from centerline	52.0	52.6
<i>Source: NTEC, 2021.</i>		

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Grading and paving activities would require the use of vibratory compacting equipment, including a vibratory roller. Vibratory rollers can produce vibration levels of 0.210 inches per second PPV at a reference distance of 25 feet according to the FTA.⁷⁰ The Project’s other construction vehicles, including earthmoving equipment, would not be capable of generating such vibration levels. As shown on Table XIII-9, vibration levels from vibratory roller usage would not exceed FTA building damage thresholds at any of the nearest off-site structures. Therefore, the Project’s construction-related vibration impact would be less than significant.

The existing Dinah’s Family Restaurant building would be exposed to Project-related construction vibrations throughout the course of construction. Historical or “character-defining” features of Dinah’s Family Restaurant that would be particularly sensitive to any construction-related vibrations are generally limited to the building’s stucco cladding and stone accent cladding. The age and qualities of this cladding would subject Dinah’s Family Restaurant to the FTA’s Class III building category for buildings consisting of non-engineered timber and masonry. The threshold for this class of building is 0.2 inches per second PPV. The construction of Dinah’s Family Restaurant is more substantial than “non-engineered timber and masonry,” but the age and condition of its plaster stucco cladding would qualify it for this particular building class designation and vibration threshold, conservatively.

As discussed earlier, the Project’s use of vibratory rollers and other construction vehicles could expose nearby buildings to groundborne vibrations. Given the proximity of Dinah’s Family Restaurant to the Project’s construction activities, vibratory rollers could generate groundborne vibrations in excess of 0.5 inch per second PPV at Dinah’s Family Restaurant, which would exceed its 0.2 inches per second PPV threshold. Such vibration levels could exacerbate any existing damage to the building’s stucco and stone accent

⁷⁰ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, September 2018.

cladding or contribute to increased rates of deterioration by causing cracking and loosening of stucco or masonry grout.

**Table XIII-9
Building Damage Vibration Levels at Off-Site Structures**

Off-Site Structures	Distance to Project Site (feet) ¹	Condition	Significance Criteria (in/sec PPV)	Impact (in/sec PPV)	Significant?
<i>Equipment: Vibratory Roller</i>					
6300 Arizona Circle (Commercial)	70	I. Reinforced concrete, steel, or timber	0.5	0.068	No
6305 Arizona Circle (Commercial)	75	I. Reinforced concrete, steel, or timber	0.5	0.063	No
6531 Sepulveda Blvd. (Extended Stay America)	80	I. Reinforced concrete, steel, or timber	0.5	0.058	No
6601 Center Drive (Commercial)	190	I. Reinforced concrete, steel, or timber	0.5	0.023	No
6101 Centinela Ave. (Commercial)	100	I. Reinforced concrete, steel, or timber	0.5	0.046	No
¹ For 6601 Center Drive and 6101 Centinela Avenue, distances have been measured to the locations of the Project's proposed sewer infrastructure relocation activities, which would occur offsite. Source: NTEC, 2021. Reference vibration levels obtained from the FTA's 2018 Transit Noise and Vibration Impact Assessment manual.					

However, it is important to note that some construction activities would occur to Dinah's Family Restaurant itself, concurrent with other sitewide construction activities. For example, the rear "take-out" portion of the building would be demolished entirely, and columns would be constructed in the western interior space of the restaurant to support the cantilevered section of the Project's new construction. The FTA methodology utilized by this analysis contains no guidance for the assessment of vibration impacts to a building that is itself under construction, but the building's partial demolition and column installation would inevitably subject the building to routine construction-related vibrations from impact tools and other sources, likely in excess of FTA thresholds. This is not an impact; vibration is an inherent byproduct, and in some cases the goal, of the types of demolition and construction work that would be necessary.⁷¹ The Project would retain character-defining features such as the restaurant's stucco and stone accent cladding, though some features affected by the proposed partial demolition and column installation

⁷¹ FTA thresholds are designed to protect buildings from vibration-induced damage. Demolishing a building by ramming it with equipment, sawing it, or hitting it with sledgehammers naturally runs contrary to that approach because building damage is a goal of demolition.

would reasonably require follow-up maintenance and rehabilitation work in order to bring the building back into operations and preserve its character-defining features.

The proposed partial demolition and construction work to Dinah's Family Restaurant, as well as necessary follow-up maintenance and rehabilitation work, puts the Project's potential construction-related vibration impact to the restaurant into perspective: though the Project's use of vibratory rollers and other construction equipment may expose Dinah's Family Restaurant to vibrations in excess of its 0.2 inches per second PPV threshold, any resultant impacts and mitigation would be moot for the following reasons: (1) The Project proposes to demolish a portion of Dinah's Family Restaurant that would be exposed to construction-related vibrations; (2) Demolition and other major structural renovations to Dinah's Family Restaurant would likely have a far greater impact on the condition of the restaurant's stucco and stone accent cladding (and other architectural features) than other non-Dinah's-related construction activities would; and (3) Follow-up maintenance and rehabilitation work of Dinah's Family Restaurant is a key component of the Project, so any architectural damages caused by the Project's construction would be repaired as part of the Project.

Thus, any exposure of Dinah's Family Restaurant to vibration levels in excess of 0.2 inches per second PPV would be largely irrelevant due to the proposed demolition and construction to Dinah's Family Restaurant and the follow-up maintenance and rehabilitation work that such activities would entail – the FTA vibration thresholds are not intended to apply to buildings that are themselves in a state of demolition or construction. Any architectural damages to the restaurant's stucco and stone accent cladding, or other features, whether they are caused by demolition and construction activities to the restaurant itself or activities related to other sitewide construction, would be repaired and preserved in a manner that is consistent with the findings of the Project's *Historical Resources Technical Report*. The Project intends to preserve and maintain Dinah's Family Restaurant: it is possible that the restaurant would exit the Project in better structural, cosmetic, and architectural condition than it entered.

Notwithstanding this analysis, Mitigation Measure NOISE-2 listed below has been prescribed to monitor and manage the effects of the Project's construction-related vibrations on Dinah's Family Restaurant and to ensure that the risk of incidental vibration damages to the restaurant are minimized as feasible, given that the restaurant itself would be subject to partial demolition and construction activities as part of the Project. Implementation of this mitigation measure would ensure that the Project would not result in significant construction-related vibration impacts.

During Project operations, there would be no significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. The Project's related vehicle travel would not be considered a significant source of vibration, as vehicle travel rarely generates perceptible groundborne vibration. As a result, the Project's

potential to generate excessive ground-borne vibration levels due to its operations would be less than significant.

c) For a project located within the vicinity of a private airstrip, 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. Although the Project Site is located approximately two miles north of Los Angeles International Airport, the site is not located within this airport's influence area, its land use plan, or its 65 dB CNEL contour zone.⁷² As a result, the Project would not expose people residing or working in the project area to excessive noise levels from aircraft, and no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

Construction

As discussed previously, the Project's construction activities could temporarily increase ambient noise levels at nearby noise-sensitive land uses. However, following implementation of mitigation, such increases would be less than significant. Though the Project's construction is not anticipated to increase ambient noise levels at the Sepulveda Boulevard Residences and Single-Family Residences receptors by greater than 5 dBA L_{eq} , any other developments that are built at the same time as the Project could contribute to additional increases in noise levels at these receptors and result in cumulatively considerable impacts. However, only one such related project is located within 500 feet of these receptors at the time of this report, a multifamily apartment building that is currently under construction at 6733 S. Sepulveda Boulevard. As discussed previously, this development would most likely be fully constructed, leased, and occupied by the time that the Project's construction begins. As a result, this related project would not contribute to cumulative construction noise levels at shared sensitive receptors. In fact, and as previously addressed, this related project would instead be a future sensitive receptor to the Project. Other related projects are located over 500 feet from the Project's sensitive receptors and would contribute nominally to cumulative construction noise levels at these receptors. As discussed previously, with mitigation, the Project's construction noise impact would be less than significant. Therefore, cumulative construction noise impacts would be less than significant.

Concerning vibration, the Project would generate minimal construction-related groundborne vibrations at the nearest surrounding structures, far below thresholds associated with building damage. As related construction projects would be located hundreds of feet from shared vibration receptors, there is no potential for cumulatively considerable vibration impacts at shared receptors. Additionally, the presence of multiple

⁷² *Los Angeles County Airport Land Use Commission GIS Interactive Map (A-Net). lacounty.maps.arcgis.com, accessed August 6, 2021.*

vibration sources rarely results in cumulative increases in groundborne vibration levels. In general, more vibration sources result in more vibration peaks (i.e., PPV groundborne vibration signals), not necessarily higher peaks, because the probabilities of constructive wave interference are extremely small. Therefore, cumulative construction vibration impacts would be less than significant.

Operation

As discussed earlier, the Project's on-site operational noise sources, such as roof-mounted HVAC equipment, would have a minimal effect on surrounding ambient noise levels. Additionally, the Project's net new trip generation would not contribute to substantial or even discernible increases in roadside noise levels. The effect of the Project's operations on surrounding ambient noise conditions would be minimal and therefore would not contribute meaningfully to any cumulatively considerable noise increases. Therefore, cumulative operational noise impacts would be less than significant.

Mitigation Measures (Noise)

As discussed above, without mitigation, the Project could result in a significant construction-related noise impact. PRC Section 21151.2 requires that a TPP incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. Prior applicable EIRs include SCAG's 2016-2040 RTP/SCS and the 2020-2045 RTP/SCS Program EIRs. The City has chosen to incorporate applicable portions of Mitigation Measure PMM NOISE-1 from the 2020-2045 RTP/SCS Program EIR, which is more recent than the 2016-2040 RTP/SCS Program EIR. As shown on Tables XIII-10 and XIII-11, with implementation of this mitigation measure (as amended for Project specifics), the Project's construction-related noise impact would be less than significant.

NOISE-1: The Project shall incorporate the following applicable measures from the 2020-2045 RTP/SCS Mitigation Measure "PMM NOISE-1" (as amended to address Project-specific impacts) to reduce the impact of construction-related noise on the Extended Stay America Hotel and the Sepulveda Boulevard Residences:

- (a) Install temporary noise barriers during construction. Temporary noise barriers shall be installed along the southern perimeter of the Project Site where the existing parking lot abuts the Extended Stay America Hotel Property. The noise barrier shall be at least 20 feet in height and rated for a transmission loss that is no less than 25 dBA. The noise barrier shall not have any gaps or holes between the panels or at the bottom that may compromise its effectiveness. The supporting structure shall be engineered and erected in order to comply with LAMC noise requirements, including those set forth in Chapter XI, Article 2 of the LAMC.

- (b) Schedule construction activities consistent with the allowable hours pursuant to the City of Los Angeles general plan noise element or noise ordinance.
- (c) Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off hours), along with permitted construction days and hours, complain procedures, and who to notify in the event of a problem.
- (d) Notify neighbors and occupants within 300 feet of the Project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.
- (e) Designate an on-site construction complaint and enforcement manager for the Project.
- (f) Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. Construction equipment shall comply with noise limits in LAMC Section 112.05.
- (g) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. Construction equipment shall comply with noise limits in LAMC Section 112.05.

- (h) Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction. Construction equipment shall comply with noise limits in LAMC Section 112.05.
- (i) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction. Construction equipment shall comply with noise limits in LAMC Section 112.05.

**Table XIII-10
Construction Noise Levels – Demolition (Mitigated)**

Receptor	Construction Noise Level (dBA L _{eq})	Existing Ambient Noise Level (dBA L _{eq})	New Noise Level (dBA L _{eq})	Increase
<i>Equipment: Excavator and Two Loaders</i>				
Extended Stay America Hotel	56.5	68.5	68.8	0.3
Sepulveda Boulevard Residences	43.7	50.9	51.7	0.8
Single-Family Residences	55.3	55.7	58.5	2.8
<i>Source: NTEC, 2021. Refer to Appendix G.</i>				

NOISE-2: The Project Applicant shall retain the services of a qualified acoustical/vibration consultant or engineer to review the existing conditions, the proposed construction equipment and construction plan, including proposed locations of demolition, grading, and construction activities, and to develop and implement a vibration monitoring program capable of documenting and assessing construction-related ground or structure vibration levels in relation to Dinah’s Family Restaurant. Pre-construction surveys shall be performed to document the conditions of the Dinah’s Family Restaurant building. The vibration monitoring program shall be implemented and recorded during the Project’s non-sewer relocation-related demolition, grading, and building construction phases, and shall include the following:

- Documentation, consisting of video and/or photographic documentation of damage-prone areas (i.e., any deteriorated stucco or stone accent cladding) and other character-defining features of historical interest that may reasonably be damaged by construction-related vibrations.
- During non-sewer relocation-related demolition, grading, and building construction phases, a vibration monitoring system shall continuously measure and store the vibration levels in inches per second PPV. The system may measure vibration from a location immediately adjacent to Dinah's Family Restaurant or via sensors located directly on character-defining features of Dinah's Family Restaurant itself. The system shall provide real-time alerts to the designated acoustical/vibration consultant or engineer, or to a construction representative, immediately when a vibration level of 0.2 inches per second PPV is measured.
- In the event the 0.2 inches per second PPV threshold is triggered, or if noticeable architectural damage becomes evident to the Project contractor, work shall immediately stop in the area of the Dinah's Family Restaurant building until the source of vibration generation has been identified and measures have been taken to prevent vibration-related damage to the building. An inspection of the Dinah's Family Restaurant building for potential architectural damage shall be conducted, the results of which shall be logged. Construction activities may then resume if the acoustical/vibration consultant or engineer and the Project contractor confirm that no vibration-induced damages have occurred. If damage is apparent, the acoustical/vibration consultant or engineer and the Project contractor shall take measures to reduce construction-related vibration levels and ensure that no further damage occurs.

**Table XIII-11
Construction Noise Levels – Grading (Mitigated)**

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
<i>Equipment: Excavator, Loader, and Bulldozer</i>				
Extended Stay America Hotel	59.3	68.5	69.0	0.5
Sepulveda Boulevard Residences	56.5	50.9	52.2	1.3
Single-Family Residences	58.1	55.7	60.1	4.4
<i>Source: NTEC, 2021. Refer to Appendix G.</i>				

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned 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 people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Would the project induce substantial unplanned 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. The Project Site is located within SCAG's jurisdiction. SCAG's mandated responsibilities include development plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. The 2020-2045 RTP/SCS includes the following proposed growth forecast for population, households, and employment for the City:⁷³

- Population: 3,933,800 persons in 2016 and 4,771,300 in 2045;
- Households: 1,367,000 households in 2016 and 1,793,000 in 2045; and
- Employment: 1,848,300 jobs in 2016 and 2,135,900 in 2045.

Table XIV-1 lists SCAG's forecasts for population, housing, employment, and persons-per-household rate for the City, as well as the number and percent change.⁷⁴

⁷³ SCAG, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Demographics and Growth Forecast, Table 14, <https://www.connectsocial.org/Documents/Adopted/0903fConnectSoCal-02-Plan.pdf>

⁷⁴ Employment information is provided for informational purposes only.

**Table XIV-1
Population, Housing, Employment,
and Persons-per-Household Forecasts for the City
Based on the 2020-2045 RTP/SCS**

Year	Population	Households	Employment¹	Person/Households
2021 ²	4,078,196	1,440,161	1,830,428	2.83
2026 ³	4,222,593	1,513,669	1,894,068	2.79
2045	4,771,300	1,793,000	2,135,900	2.66
Change 2021 to 2026³				
Number Changed	+144,397	+73,508	+63,640	-0.04
Percent Changed	+3.56%	+5.15%	+3.50%	-1.48%
Change 2026 to 2045				
Number Changed	+548,707	+279,331	+241,832	-0.13
Percent Changed	+12.99%	+18.45%	+12.76%	-4.60%
¹ Employment information is provided for informational purposes only. ² Population, housing and employment rate data for 2021 (baseline year) and 2026 (anticipated buildout year of the Project) was calculated based on a linear interpolation of growth projections in SCAG's 2020-2045 RTP/SCS. ³ Represents a comparison of baseline year to Project buildout year.				

Project Impacts

Construction

The construction activities associated with the Project would create temporary construction-related jobs. Nevertheless the work requirements of most construction activities are highly specialized, so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be anticipated to relocate their residence to the Project area and would not induce substantial population growth and/or require permanent housing. Therefore, the Project's population growth impacts associated with construction activities would be less than significant.

Operation

Indirect Growth

The Project includes infill development of a site that is located in an urbanized area. The Project would include relocation of a sewer line from the Project Site to the ROW near the

site. This relocation would allow for development of the Project on the Project Site but would not allow for expansion of new development. Otherwise, the Project would be served by existing infrastructure and would not require or include the development of any new utility or roadway infrastructure beyond what is required to accommodate the Project only. Thus, the Project would not indirectly induce substantial population growth, and no impacts related to indirect population growth would occur as a result of the Project.

Direct Growth

The 2.205-acre Project Site is currently developed with approximately 24,000 square feet of commercial uses, Dinah’s restaurant, and associated surface parking. With the exception of Dinah’s restaurant use, all existing uses would be demolished and removed from the Project Site, and the site would be developed with an eight-story, 362-unit multi-family residential building, with approximately 3,700 square feet of ground-floor restaurant (in addition to Dinah’s). Forty-one of the multi-family residential units would be restricted to Very Low Income households. Based on *Transportation Assessment* prepared for the Project (refer to Appendix I), the Project would add a residential population of approximately 852 people to the Project Site. As shown on Table XIV-2, the Project’s residential population and number of housing units would represent less than one percent of the forecasted growth between 2020 and 2026 and 2026 and 2045. Thus, the Project’s population and housing growth would fall within the forecasted growth for the City. Thus, the Project would not represent substantial or significant unplanned growth as compared to projected growth for the City. Therefore, Project impacts related to population and housing growth would be less than significant.

**Table XIV-2
Project Estimated Comparison for the City
Based on the 2020-2045 RTP/SCS**

Project	Comparison Amount ¹	% of Comparison
As compared to Growth Forecast from 2021 to 2026		
852 residents	+144,397	0.59%
362 units	+88,210	0.49%
As compared to Growth Forecast from 2026 to 2045		
852 residents	+548,707	0.15%
362 units	+279,331	0.12%
¹ Refer to Table XIV-1.		

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. No people are living at the Project Site, and no housing is located on the Project Site. As such, the Project would not displace substantial numbers of existing

housing, necessitating the construction of replacement housing elsewhere, and no impacts related to this issue would occur.

Cumulative Impacts

Of the six related projects listed on Table 3-2 on page 38 of the *Transportation Assessment* prepared for the Project (refer to Appendix I), four of the related projects are located in the City of Los Angeles and two are located in the City of Culver City. Because the City of Los Angeles has no jurisdiction over the City of Culver City, this analysis focused on growth in the City of Los Angeles.

Of the four related projects in the City, two of the related projects include development of residential uses (a total of 356 dwelling units), and the other two related projects include development of office uses (a total of 40,744 square feet). The office uses could create employment that can be filled from the existing workforce in the City, but office uses could provide new jobs that would attract new residents to the area. However, the more direct generator of potentially new residents is residential development.

Combined with the Project, the potential cumulative housing increase would be 718, and the potential cumulative residential population increase would be 1,758, based on the *Transportation Assessment* prepared for the Project (refer to Appendix I). As shown on Table XIV-3, cumulative population would represent approximately 1.01 percent of the forecasted population growth between 2020 and 2026, and cumulative housing growth would represent less than one percent of the forecasted housing growth between 2020 and 2026. Cumulative population and housing growth would represent less than one percent of the forecasted growth between 2026 and 2045. Thus, cumulative population and housing growth would fall within the forecasted growth for the City. Thus, cumulative development would not represent substantial or significant unplanned growth as compared to projected growth for the City. Therefore, cumulative impacts related to population and housing growth would be less than significant.

**Table XIV-3
Cumulative Estimated Comparison for the City of Los Angeles**

Project	Comparison Amount¹	% of Comparison
As compared to Growth Forecast from 2021 to 2026		
1,758 residents	+173,276	1.21%
718 units	+88,210	0.97%
As compared to Growth Forecast from 2026 to 2045		
1,758 residents	+548,707	0.32%
718 units	+279,331	0.25%
¹ Refer to Table XIV-1.		

XV. PUBLIC SERVICES

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:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Fire protection?

Less Than Significant Impact. The 2.205-acre Project Site is currently developed with approximately 24,000 square feet of commercial uses, Dinah’s restaurant, and associated surface parking. With the exception of Dinah’s restaurant use, all existing uses would be demolished and removed from the Project Site, and the site would be developed with an eight-story, 362-unit multi-family residential building, with approximately 3,700 square feet of ground-floor restaurant (in addition to Dinah’s). The proposed mixed-use development would be similar to other mixed-used developments already found in the Project Site area and region. Based on the *Transportation Assessment* prepared for the Project (refer to Appendix I), the Project would add a residential population of approximately 852 people to the Project Site. It should be noted that it is possible that all or some of the 852 residents could already live in the City with an existing demand for fire protection services and would relocate to the Project Site, thereby resulting in a proportional net increase or no net increase in the demand for fire protection services. This analysis conservatively assumes that all 852 residents would be new residents to the City.

The LAFD considers fire protection services for a project adequate if a project: (1) is within the maximum response distance for the land uses proposed; (2) complies with emergency access requirements; (3) complies with fire-flow requirements; and (4) complies with fire hydrant placement. Pursuant to LAMC Section 57.507.3.3, the maximum response

distance between a high-density residential/commercial neighborhood land use such as the Project and a LAFD station that houses an engine company is 1.5 miles and a LAFD station that houses a truck company is 2 miles. If these distances are exceeded, all structures shall be constructed with automatic fire sprinkler systems.

The Project Site is served by several fire stations, as shown on Table XV-1. As shown, the Project Site is located approximately 2.3 miles from LAFD Fire Station 5. Pursuant to the Fire Code, the proposed building would be required to include a fire sprinkler system, which it will do.

**Table XV-1
Fire Stations Serving the Project Site**

No.	Address	Distance from Project Site (miles)
5	8900 Emerson Avenue	2.3
67	5451 Playa Vista Drive	2.5
58	5757 S. Fairfax Avenue	2.5
95	10010 International Road	3.6
<i>Source: http://www.lafd.org/fire-stations/find-your-station</i>		

All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department and LAFD standards and requirements for design and construction. Thus, the Project would not result in any significant impacts related to emergency access. Based on Section 57.507.3 of the LAMC, the approximate fire-flow requirement for a high-density residential/commercial neighborhood land use such as the Project is 4,000 gallons per minute from four hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch. Final fire-flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project during LAFD’s plan check process, and any necessary infrastructure improvements would be completed by the Project. Through compliance with these requirements, the Project would not cause the need for new or altered fire protection facilities, the construction of which could result in significant environmental impacts. Therefore, Project impacts related to fire protection services would be less than significant.

Cumulative Impacts

Of the six related projects listed on Table 3-2 on page 38 of the *Transportation Assessment* prepared for the Project (refer to Appendix I), four of the related projects are located in the City of Los Angeles and two are located in the City of Culver City. Because the City of Los Angeles has no jurisdiction over the City of Culver City, this analysis focused on growth in the City of Los Angeles.

Implementation of the four related projects located in the City of Los Angeles, in concert with the Project, could result in a net increase in the number of residents and employees in the Project Site area and could further increase the demand for fire protection services. Cumulative development requires the LAFD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the proposed Project, the related projects would be subject to the Fire Code and other applicable regulations of the LAMC including, but not limited to, automatic fire sprinkler systems for projects located farther than specified distances from the nearest LAFD fire stations to compensate for additional response time, and other recommendations made by the LAFD to ensure fire protection safety. Through the process of compliance, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAFD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the proposed Project and related projects would contribute. Thus, cumulative development would not cause the need for new or altered fire protection facilities, the construction of which could result in significant environmental impacts. Therefore, the cumulative impact to fire protection services would be less than significant.

b) Police protection?

Less Than Significant Impact. The Project Site is located within the boundaries of LAPD's Pacific Community area (Reporting District 1466), which services a residential population of over 200,000 people.

Construction

Although there is the potential for Project construction to create an increase in demand for police protection services, the Project would provide security on the Project Site as needed and appropriate during the construction process. This security would include perimeter fencing, lighting, and security guards, thereby reducing the demand for LAPD services. The specific type and combination of construction site security features would depend on the phase of construction. The Applicant would install temporary construction fencing to secure the Project Site during the construction phase to ensure that valuable materials (e.g., building supplies and metals such as copper wiring), as well as construction equipment are not easily stolen or abused.

During construction, emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Lights and other identifying noises compel traffic to pull to the side where available to provide access through traffic. Although minor traffic delays due to potential lane closures could occur during construction, particularly during the construction of utilities and street improvements, impacts to police response times are considered to be less than significant for the following reasons:

- (1) Emergency access would be maintained to the Project Sites during construction through marked emergency access points approved by the LAPD;
- (2) Construction impacts are temporary in nature and do not cause lasting effects; and
- (3) Partial lane closures, if determined to be necessary, would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Sites, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

Construction of the Project would not affect the LAPD's ability to respond to emergencies to the extent that there is no a need for any additional new or expanded police facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the LAPD. For these reasons, Project construction impacts on police services would be less than significant.

Operation

The 2.205-acre Project Site is currently developed with approximately 24,000 square feet of commercial uses, Dinah's restaurant, and associated surface parking. With the exception of Dinah's restaurant use, all existing uses would be demolished and removed from the Project Site, and the site would be developed with an eight-story, 362-unit multi-family residential building, with approximately 3,700 square feet of ground-floor restaurant (in addition to Dinah's). The proposed mixed-use development would be similar to other mixed-used developments already found in the Project Site area and region. Based on the *Transportation Assessment* prepared for the Project (refer to Appendix I), the Project would add a residential population of approximately 852 people to the Project Site. It should be noted that it is possible that all or some of the 852 residents could already live in the City with an existing demand for police protection services and would relocate to the Project Site, thereby resulting in a proportional net increase or no net increase in the demand for police protection services. This analysis conservatively assumes that all 852 residents would be new residents to the City.

According to the LAPD, According to the LAPD, the Project would have a minor impact on police protection services.⁷⁵ Additionally, in accordance with the City's practices, the Project developer would be required to refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the LAPD. The Project would include standard security measures such as adequate security lighting, controlled residential access, and secure parking facilities. These measures for the Project shall be

⁷⁵ LAPD, Michel R. Moore, Chief of Police, correspondence, January 17, 2022. Refer to Appendix H.

approved by the LAPD prior to the issuance of building permits. Further, the Applicant would be required to provide the Commanding Officer of the Pacific Community Police Station with a diagram of each portion of the Project. Through compliance with the requirements of the LAPD, the Project would not cause the need for new or altered police protection facilities, the construction of which could result in significant environmental impacts. Therefore, Project impacts related to police protection services would be less than significant.

Cumulative Impacts

Of the six related projects listed on Table 3-2 on page 38 of the *Transportation Assessment* prepared for the Project (refer to Appendix I), four of the related projects are located in the City of Los Angeles and two are located in the City of Culver City. Because the City of Los Angeles has no jurisdiction over the City of Culver City, this analysis focused on growth in the City of Los Angeles.

Implementation of the four related projects located in the City of Los Angeles, in concert with the Project, could result in a net increase in the number of residents and employees in the Project Site area and could further increase the demand for police protection services. Cumulative development requires the LAPD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the proposed Project, the related projects would be subject to the review and oversight of the LAPD related to crime prevention features, and other applicable regulations of the LAMC. Through the process of compliance, the ability of the LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the proposed Project and related projects would contribute. According to the LAPD, the Project, combined with other past, present, or future projects, would not result in the need for new or altered police facilities.⁷⁶ Thus, cumulative development would not cause the need for new or altered police protection facilities, the construction of which could result in significant environmental impacts. Therefore, the cumulative impact to police protection services would be less than significant.

c) Schools?

Less Than Significant Impact. Los Angeles Unified School District's (LAUSD) schools that serve the Project Site and area are shown on Table XV-2. As shown, the elementary school serving the Project Site and area has capacity of approximately 119 students, whereas the middle and schools are operating overcapacity. As shown on Table XV-3, the Project would generate a total of approximately 158 students. It should be noted that it is possible that all or some of the estimated Project students could already live in the

⁷⁶ *Ibid.*

City with an existing demand for school services and would relocate to the Project Site, thereby resulting in a proportional net increase or no net increase in the demand for school services. This analysis conservatively assumes that all estimated Project students would be new students to the City. As stated, the elementary school serving the Project Site and area is currently operating under capacity, while the middle and high schools serving the Project Site and area are operating over capacity. However, pursuant to California Government Code Section 65995, payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Thus, the Project would not cause the need for new or altered school facilities, the construction of which could result in significant environmental impacts. Therefore, Project impacts to school services would be less than significant.

**Table XV-2
LAUSD Schools Serving the Project Site Area and
Student Capacity and Enrollment**

School Type (Grade)	School Name	Capacity	Residential Enrollment	Actual Enrollment	(-)Under/(+)Over Capacity
Elementary School	Cowan Avenue	488	369	393	-119
Middle School	Wright	643	868	435	+245
High School	Westchester	945	952	730	+7

Source: LAUSD, 2020. Refer to Appendix H.

**Table XV-3
Estimated Project Student Generation**

Land Use	Size	Student Type	Student Generation Rate ¹	Total Students Generated
Residential	362 du	Elementary (K-6)	0.2269/du	82
		Middle (7-8)	0.0611/du	22
		High (9-12)	0.1296/du	47
		Special Day Class	0.0194/du	7
Total				158

du = dwelling unit

¹ 2020 Developer Fee Justification Study, LAUSD, March 2020.

Cumulative Impacts

Implementation of the six related projects listed on Table 3-2 on page 31 of the *Transportation Assessment* prepared for the Project (refer to Appendix I) in concert with the Project could result in a net increase in the number of students in the Project Site area

and could further increase the demand for school services. Four of the related projects are located within the service boundaries of the LAUSD, and two of the related projects are located in the boundaries of the Culver City Unified School District, which also requires payment of a developer fee for new development. Thus, similar to the Applicant of the Project, the applicants of all the related projects would be required to pay the state mandated applicable school fees to their respective school districts to ensure that no significant impacts to school services would occur. Thus, cumulative development would not cause the need for new or altered school facilities, the construction of which could result in significant environmental impacts. Therefore, the cumulative impacts to school services would be less than significant.

d) Parks?

Less Than Significant Impact. The Los Angeles Department of Recreation and Parks (LADRP) operates and maintains park and recreational services and facilities in the Project area. Parks and recreational facilities that serve the Project Site are listed below.⁷⁷

Community Parks (Within 5-mile Radius)

- Baldwin Hills Recreation Center
- Cheviot Hills Park
- Claude Pepper Senior Citizen Center
- Culver/Slauson Park
- Del Rey Lagoon
- Glen Alla Park
- Jim Gilliam Recreation Center
- Los Angeles Center for Enriched Studies (LACES)
- Mar Vista Gardens Recreation Center
- Mar Vista Recreation Center
- Oakwood Recreation Center
- Palms Recreation Center
- Penmar Recreation Center
- Rancho Cienega Sports Complex
- Robertson Recreation Center
- Saint Andrews Recreation Center
- Van Ness Recreation Center
- Venice High School Pool
- Vineyard Recreation Center
- Westchester Recreation Center

⁷⁷ *City of Los Angeles Department of Recreation and Parks, Cathie M. Santo Domingo, Acting Assistant General Manager, July 22, 2021. Refer to Appendix H.*

Regional Parks (Within 10-mile Radius)

- Beverly Glen Park
- Exposition Park Rose Garden
- Holmby Park
- Isidore B. Dockweiler State Beach
- Laurel Canyon Mulholland Park
- Mandeville Canyon Park
- Rivas Canyon Park
- Runyon Canyon Park
- Rustic Canyon Park
- Sullivan Canyon Park
- Venice Beach
- Wattles Garden Park
- Will Rogers State Beach

The 2.205-acre Project Site is currently developed with approximately 24,000 square feet of commercial uses, Dinah's restaurant, and associated surface parking. With the exception of Dinah's restaurant use, all existing uses would be demolished and removed from the Project Site, and the site would be developed with an eight-story, 362-unit multi-family residential building, with approximately 3,700 square feet of ground-floor restaurant (in addition to Dinah's). Based on the *Transportation Assessment* prepared for the Project (refer to Appendix I), the Project would add a residential population of approximately 852 people to the Project Site. It should be noted that it is possible that all or some of the 852 residents could already live in the City with an existing demand for parks and would relocate to the Project Site, thereby resulting in a proportional net increase or no net increase in the demand for parks. This analysis conservatively assumes that all 852 residents would be new residents to the City.

As shown on Table XV-4, based on LAMC open space standards and after application of a 26 percent reduction in open space pursuant to State density bonus law, the Project would be required to include a minimum of 29,119 square feet of open space. As shown on Table XV-5, the Project would provide 29,258 square feet of open space, including a courtyard, clubrooms and fitness amenities, a roof deck, and private open space.

**Table XV-4
Open Space Requirements**

Unit Type	Number of Units	LAMC Section 12.21 G.2 Open Space Requirement	Size
Studio	126	100 sf/unit	12,600 sf
1 Bedroom	110	100 sf/unit	11,000 sf
2 Bedroom	126	125 sf/unit	15,750 sf
LAMC Section 12.21 G.2 Total Required			39,350 sf
(Less 26%, Density Bonus Incentive)			(10,231 sf)
Total Required			29,119 sf
<i>LAMC = Los Angeles Municipal Code sf = square feet</i>			
<i>Source: Carrierjohnson + Culture, May 27, 2021.</i>			

**Table XV-5
Project Open Space**

Type	Size
<u>Common Open Space</u>	
Level 4 Courtyard	14,519 sf
Level 4 Clubhouse & Fitness Amenities	2,409 sf
Level 5 Clubhouse & Fitness Amenities	1,201 sf
Level 8 Clubhouse	2,145 sf
Level 8 Roof Deck	<u>1,084 sf</u>
Total Common Open Space	21,358 sf
<u>Private Open Space</u>	
Level 1	400 sf
Level 4	1,300 sf
Level 5	1,350 sf
Level 6	1,700 sf
Level 7	1,550 sf
Level 8	<u>1,600 sf</u>
Total Private Open Space	7,900 sf
Total Open Space	29,258 sf
<i>sf = square feet</i>	
<i>Source: Carrierjohnson + Culture, May 27, 2021.</i>	

The parkland-to-population ratio goal for the City provided in the Westchester-Playa Del Rey Community Plan is 2.4 acres of neighborhood and community parkland per 1,000 residents generated. Thus, implementation of the Project would require approximately

2.04 acres of parkland.⁷⁸ However, in accordance with Ordinance 184,505, the Applicant shall be required to dedicate land or to pay a fee for the purpose of developing park and recreational facilities to mitigate the Project's demand for parks and recreational facilities. Through compliance with City requirements, the Project would not cause the need for new or altered parks and recreational services, the construction of which could result in significant environmental impacts. Therefore, Project impacts related to parks and recreational services would be less than significant.

Cumulative Impacts

Implementation of the six related projects listed on Table 3-2 on page 31 of the *Transportation Assessment* prepared for the Project (refer to Appendix I) in concert with the Project could result in a net increase in the number of residents in the Project Site area and could further increase the demand for parks. Four of the related projects are located in the City, and two of the related projects are located in Culver City, which also requires the inclusion of open space and payment of park fees (or parkland dedication) to mitigate demand for parks. Thus, cumulative development would not cause the need for new or altered parks and recreational facilities, the construction of which could result in a significant impact. Therefore, the cumulative impact on parks would be less than significant.

e) Other public facilities?

Libraries

Less Than Significant Impact. Libraries in the Project Site area include the following:

- Mar Vista Branch Library
- Lloyd Taber-Marina del Rey Library
- Playa Vista Branch Library
- Westchester-Loyola Village Branch Library
- View Park Bebe Moore Campbell Library

The 2.205-acre Project Site is currently developed with approximately 24,000 square feet of commercial uses, Dinah's restaurant, and associated surface parking. With the exception of Dinah's restaurant use, all existing uses would be demolished and removed from the Project Site, and the site would be developed with an eight-story, 362-unit multi-family residential building, with approximately 3,700 square feet of ground-floor restaurant (in addition to Dinah's). Based on the *Transportation Assessment* prepared for the Project (refer to Appendix I), the Project would add a residential population of approximately 852 people to the Project Site. It should be noted that it is possible that all or some of the 852 residents could already live in the City with an existing demand for parks and would

⁷⁸ $[(852 \text{ residents}) \div (1,000)] = .852 \text{ thousand residents. } [(2.4 \text{ acres of parkland}) \times (.852 \text{ thousand residents})] = 2.04 \text{ required acres.}$

relocate to the Project Site, thereby resulting in a proportional net increase or no net increase in the demand for parks. This analysis conservatively assumes that all 852 residents would be new residents to the City. Although the Project could increase the demand for library services in the Project Site area, because the area is well served by several existing libraries, the Project would not cause the need for new or altered library facilities, the construction of which could result in significant environmental impacts. Therefore, Project impacts related to library services would be less than significant.

Cumulative Impacts

Implementation of the residential related projects listed on Table 3-2 on page 31 of the *Transportation Assessment* prepared for the Project (refer to Appendix I) in concert with the Project could result in a net increase in the number of residents in the Project Site area and could further increase the demand for library services. However, the Project Site area is well served by several existing libraries, and cumulative development would not cause the need for new or altered library facilities, the construction of which could result in significant environmental impacts. Therefore, cumulative impacts related to library services would be less than significant.

XVI. 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 facility would occur or be accelerated?

Less Than Significant Impact. Refer to the response to Checklist Question XI(a)(iv) (Public Services – Parks).

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The Project includes development of a variety of indoor and outdoor private and public open space areas that would serve Project residents. The impact of developing the Project’s open space is inclusive of the overall impacts of the Project. The Project does not include the construction of recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. Therefore, no Project impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

Refer to the response to Checklist Question XI(a)(iv) (Public Services – Parks).

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis in this section is primarily based on the following (refer to Appendix I):

- *Transportation Assessment, Linscott, Law & Greenspan, Engineers, July 8, 2021.*
- *LADOT Approval Letter, October 6, 2021.*

Senate Bill 743 (SB 743), effective in January 2014, required the Governor’s Office of Planning and Research to change the CEQA guidelines regarding the analysis of transportation impacts. Under SB 743, the focus of transportation analysis shifts from driver delay or level of service (LOS) to VMT, in order to reduce GHG emissions, create multimodal networks, and promote mixed-use developments.

To adapt to SB 743, the City Planning Commission, on February 28, 2019, recommended the approval of revised guidelines to include new transportation analysis screening procedures and thresholds, subsequently approved by the City Council on July 30, 2019. The Los Angeles Department of Transportation (LADOT) concurrently adopted its Transportation Assessment Guidelines (TAG), which were subsequently revised in July 2020, and which define the methodology of analyzing a project’s transportation impacts in accordance with SB 743.

Per the TAG, the CEQA transportation analysis contains the following thresholds for identifying significant impacts:

- Threshold T-1: Conflicting with Plans, Programs, Ordinances, or Policies
- Threshold T-2.1: Causing Substantial Vehicle Miles Traveled (VMT)
- Threshold T-2.2: Substantially Inducing Additional Automobile Travel
- Threshold T-3: Substantially Increasing Hazards Due to a Geometric Design Feature or Incompatible Use

These thresholds are discussed below.

a) Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. As discussed below, Project impacts related to consistency with adopted plans and policies would be less than significant

Consistency with Adopted Plans and Policies (Threshold T-1)

The City aims to achieve an accessible and sustainable transportation system that meets the needs of all users. The City’s adopted transportation-related plans and policies affirm that streets should be safe and convenient for all users of the transportation system, including pedestrians, bicyclists, motorists, public transit riders, disabled persons, senior citizens, children, and movers of commercial goods. Therefore, the transportation requirements for proposed developments should be consistent with the City's transportation goals and policies. Proposed projects shall be analyzed to identify potential conflicts with adopted City plans and policies and, if there is a conflict, improvements that prioritize access for and improve the comfort of people walking, bicycling, and riding transit in order to provide safe and convenient streets for all users should be identified. Projects designed to encourage sustainable travel help to reduce vehicle miles traveled. This section provides a review of the screening criteria and a summary of the consistency of the Project with the City’s adopted plans and policies.

Screening Criteria

If the project requires a discretionary action, and the answer is yes to any of the following questions, further analysis is required to assess whether the proposed project would conflict with adopted City plans, programs, ordinances, or policies that establish the transportation planning framework for all travel modes:

- Does the project require a discretionary action that requires the decision maker to find that the decision substantially conforms to the purpose, intent, and provisions of the General Plan?
 - Yes, the Project requires a discretionary action.

- Is the project known to directly conflict with a transportation plan, policy, or program adopted to support multimodal transportation options or public safety?
 - No, the Project is not known to directly conflict with a transportation plan, policy, or program adopted to support multimodal transportation options or public safety.
- Is the project proposing to, or required to make any voluntary or required modifications to the public right-of-way (i.e., street dedications, reconfigurations of curb line, etc.)?
 - Yes, an 18-foot street dedication requirement and an eight-foot roadway widening improvement is required for Sepulveda Boulevard along the Project Site. Additionally, a one-foot roadway widening improvement is required for Arizona Avenue along the Project Site. The Project Applicant is requesting a Waiver of Dedications and Improvements (WDI) pursuant to LAMC Section 12.37 I.3 to seek relief from the dedication and improvement requirements as they are not necessary to meet the City’s mobility needs as outlined in Mobility Plan 2035.

As the answer is “yes” to two out of the three screening criteria questions, further analysis is required to assess whether the Project would conflict with adopted City plans, programs, ordinances, or policies.

Impact Criteria and Methodology

Threshold T-1 of LADOT’s *Transportation Assessment Guidelines* (TAG) asks the following:

- Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities?

The threshold test is to assess whether a project would conflict with an adopted program, policy, plan, or ordinance that is adopted to protect the environment. In general, transportation policies or standards adopted to protect the environment are those that support multimodal transportation options and a reduction in VMT. Conversely, a project would not be shown to result in an impact merely based on whether or not it would implement a particular program, plan, policy, or ordinance. Many of these programs must be implemented by the City itself over time, and over a broad area, and it is the intention of this threshold test to ensure that proposed development projects and plans do not preclude the City from implementing adopted programs, plans and policies.

The methodology for determining a project's transportation impacts associated with conflicts with plans, programs, ordinances, or policies is defined per the City's TAG as follows:

- A project that generally conforms with and does not obstruct the City's development policies and standards will generally be considered to be consistent. The project applicant should review the documents and ordinances identified in the TAG (refer to Table 2.1-1 on pages 10 and 11 of the TAG) for City plans, policies, programs, ordinances, and standards relevant to determining project consistency. A specific list of questions (refer to Table 2.1-2 on pages 12 through 14 of the TAG) shall be answered in order to help guide whether the project conflicts with City circulation system policies. A "yes" or "no" answer to these questions does not determine a conflict. Rather, as indicated in the list of questions (i.e., Table 2.1-2 of the TAG), the project applicant shall review relevant policies and programs corresponding to the questions to assess whether the proposed project precludes the City's implementation of any adopted policy and/or program.
- If vacation of a public right-of-way, or relief from a required street dedication is sought as part of a proposed project, an assessment should be made as to whether the right-of-way in question is necessary to serve a long-term mobility need, as defined in the Mobility Plan 2035, transportation specific plan, or other planned improvement in the future.

Review of Project Consistency

The Project would not conflict with the relevant City plans, policies and programs and would not include any features that would preclude the City from completing and complying with these guiding documents and policy objectives. The Project Applicant is requesting a WDI pursuant to LAMC Section 12.37 I.3 to seek relief from certain dedication and improvement requirements, as the dedication and improvement requirements are not necessary to meet the City's mobility needs as outlined in Mobility Plan 2035. As discussed in detail in Appendix E of the *Transportation Assessment* prepared for the Project (refer to Appendix I), the Project would not conflict with the dedication and improvement requirements that are needed to comply with the Mobility Plan 2035 Street Designations and Standard Roadway Dimensions. The Project would not conflict with any plans or policies that govern the public right-of-way, such as LADOT's Manual of Policy and Procedures (MPP) Section 321, Driveway Design, and the Citywide Design Guidelines – Guideline 2. The Project would be consistent with the GHG emissions reduction targets forecasted in the 2020-2045 RTP/SCS. Additionally, and as discussed in detail in Appendix E of the *Transportation Assessment*, the Project would be consistent with the transportation-related elements of the Plan for a Healthy Los Angeles (Healthy LA), Vision Zero, the Mobility Hubs Reader's Guide, the City's Walkability Checklist, and the Westchester-Playa del Rey Community Plan Community Plan.

Thus, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. Therefore, Project impacts related to Threshold T-1 would be less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3?

Less Than Significant Impact. As discussed below, Project impacts related to VMT would be less than significant.

VMT Analysis (Threshold T-2.1)

The State of California Governor’s Office of Planning and Research (OPR) issued proposed updates to the CEQA guidelines in November 2017 and an accompanying technical advisory guidance in April 2018 (OPR Technical Advisory) that amends the Appendix G (of the CEQA Guidelines) question for transportation impacts to delete reference to vehicle delay and level of service and instead refer to Section 15064.3, subdivision (b)(1) of the CEQA Guidelines asking if the project will result in a substantial increase in vehicle miles traveled (VMT). Section 15064.3, subdivision (b)(1) states the following:

Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact.

Comprehensive updates to the CEQA Guidelines were certified and adopted by the California Natural Resources Agency in December 2018. Accordingly, the City adopted significance criteria for transportation impacts based on VMT for land use projects and plans in accordance with the amended Appendix G (of the CEQA Guidelines) question:

- Threshold T-2.1: For a land use project, would the project conflict or be inconsistent with CEQA guidelines Section 15064.3, subdivision (b)(1)?

For land use projects, the intent of this threshold is to assess whether a land use project or plan causes substantial vehicle miles traveled. The City has developed the screening and impact criteria (discussed below) to address this question. The criteria below are based on the OPR technical advisory but reflects local considerations.

If the project requires discretionary action, and the answer is no to either T-2.1-1 or T-2.1-2, further analysis will not be required for CEQA Threshold T-2.1, and a “no impact” determination can be made for that threshold:

- T-2.1-1: Would the land use project generate a net increase of 250 or more daily vehicle trips?

For purposes of screening the daily vehicle trips, a proposed project's daily vehicle trips should be estimated using the City's VMT Calculator tool or the most recent edition of the ITE Trip Generation Manual. TDM strategies should not be considered for the purposes of screening. If existing land uses are present on the project site or there were previously terminated land uses that meet the criteria for trip credits described in the trip generation methodology discussion (refer to Subsection 3.3.4.1 of the TAG), the daily vehicle trips generated by the existing or qualified terminated land uses can be estimated using the VMT Calculator tool and subtracted from the proposed project's daily vehicle trips to determine the net increase in daily vehicle trips.

- T-2.1-2: Would the project generate a net increase in daily VMT?

For the purpose of screening the VMT, a project's daily VMT should be estimated using the City's VMT Calculator tool or the City's Travel Demand Forecasting (TDF) model. TDM strategies should not be considered for the purpose of screening. If existing land uses are present on the project site or there were previously terminated land uses that meet the criteria for trip credits description in the trip generation methodology discussion (refer to Subsection 3.3.4.1 of the TAG), the daily VMT generated by the existing or qualified terminated land uses can be estimated using the City VMT Calculator tool and subtracted from the project's daily VMT to determine the net increase in daily VMT.

In addition to the above screening criteria, the portion of, or the entirety of a project that contains small-scale or local serving retail uses are assumed to have less than significant VMT impacts.⁷⁹ If the answer to the following question is no, then that portion of the project meets the screening criteria, and a no impact determination can be made for the portion of the project that contains retail uses. However, if the retail project is part of a larger mixed-use project, then the remaining portion of the project may be subject to further analysis in accordance with the above screening criteria. Projects that include retail uses in excess of the screening criteria would need to evaluate the entirety of the project's VMT, as specified in Subsection 2.2.4 of the TAG.

- If the project includes retail uses, does the portion of the project that contain retail uses exceed a net 50,000 square feet?

⁷⁹ As noted in the TAG, the definition of retail for this purpose includes restaurant.

Impact Criteria and Methodology

For development projects, the proposed project will have a potential VMT impact if the project meets the following:

- For residential projects, the project would generate household VMT per capita exceeding 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located.
- For office projects, the project would generate work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC in which the project is located.
- For regional serving retail projects, the project would result in a net increase in VMT.
- For other land use types, measure VMT impacts for the work trip element using the criteria for office projects above.

Different VMT significance thresholds have been established for each APC boundary area as the characteristics of each are distinct in terms of land use, density, transit availability, employment, etc. The City’s significance thresholds (i.e., provided on a daily household VMT per capita basis and a daily work VMT per employee basis) for each of the seven APC boundary areas are presented on Table XVII-1. As the Project Site is located within the West Los Angeles APC, the VMT impact criteria (i.e., 15 percent below the APC average) applicable to the Project is 7.4 Daily Household VMT per Capita and 11.6 Daily Work VMT per Employee.

**Table XVII-1
VMT Impact Criteria**

APC	15% Below APC Criteria	
	Daily Household VMT per Capita	Daily Work VMT per Employee
Central	6.0	7.6
East LA	7.2	12.7
Harbor	9.2	12.3
North Valley	9.2	15.0
South LA	6.0	11.6
South Valley	9.4	11.6
West LA	7.4	11.1

Source: TAG, LADOT, July 2020.

The impact methodology set forth in the TAG for a mixed-use project such as the Project is as follows:

Mixed-Use Projects. The project VMT impact should be considered significant if any one (or all) of the project land uses exceed the impact criteria for that particular land use, taking credit for internal capture. In such cases, mitigation options that reduce the VMT generated by any or all of the land uses could be considered.

Summary of Project VMT Analysis

The daily vehicle trips and VMT expected to be generated by the Project were forecast using Version 1.3 of the City's VMT Calculator tool. As indicated in the summary VMT Calculator worksheet, the Project is forecast to generate the following:

- The Project is estimated to generate a total of 2,650 daily vehicle trips and 1,062 net new daily vehicle trips.
- The estimated Daily Household VMT per Capita for the Project is 7.1 Daily Household VMT per Capita, which is less than the West Los Angeles APC significance threshold of 7.4 Daily Household VMT per Capita.
- Per the TAG, the Project's restaurant component, which totals 10,783 square feet, is considered a local-serving retail use. As the restaurant component provides less than 50,000 square feet, the Project's restaurant component would result in a "less than significant" VMT impact.

It is noted that the Project would incorporate three TDM measure as part of the Project, including the following:

- Reduced vehicle parking supply;
- TDM strategy that includes passive educational and promotional materials, such as posters, information boards, or a website with information that residents and employees can choose to read at their own leisure; and
- Bicycle parking in accordance with LAMC requirements.

Thus, based on the above analyses, the Project is not expected to result in a significant VMT impact. Therefore, no mitigation is necessary as it relates to VMT.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. As discussed below, Project impacts related to geometric design features or incompatible uses would be less than significant

Geometric Design Threshold (T-3)

As stated in the City's TAG document (refer to Section 2.4.1 of the TAG), impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from the project site, and may include safety, operational, or capacity impacts. Impacts can be related to vehicle/vehicle, vehicle/bicycle, or vehicle/pedestrian conflicts as well as to operational delays caused by vehicles slowing and/or queuing to access a project site. These conflicts may be created by the driveway configuration or through the placement of project driveway(s) in areas of inadequate visibility, adjacent to bicycle or pedestrian facilities, or too close to busy or congested intersections. Evaluation of access impacts require details relative to project land use, size, design, location of access points, etc. These impacts are typically evaluated for permanent conditions after project completion but can also be evaluated for temporary conditions during project construction. Project access can be analyzed in qualitative and/or quantitative terms, and in conjunction with the review of internal site circulation and access to parking areas. All proposed site access points should be evaluated.

Screening Criteria

If the project requires a discretionary action, and the answer is "yes" to either of the following questions, further analysis will be required to assess whether the project would result in impacts due to geometric design hazards or incompatible uses:

- *Is the project proposing new driveways, or introducing new vehicle access to the property from the public right-of-way?*
 - **No**, the Project proposes to utilize the existing driveways at the southwesterly portion of the Project Site along the east side of Arizona Avenue and the southeasterly portion of the Project Site along the west side of Sepulveda Boulevard.
- *Is the project proposing to, or required to make any voluntary or required, modifications to the public right-of-way (i.e., street dedications, reconfigurations of curb line, etc.)?*

As stated in the City's TAG document (refer to Section 2.4.2 of the TAG), for the purpose of the screening for projects that are making physical changes to the public right-of-way, determine the street designation and improvement standard for any project frontage along streets classified as an Avenue or Boulevard (as designated in the City's General Plan) using the Mobility Plan 2035, or NavigateLA. If any street fronting the project site is an Avenue or Boulevard and it is determined that additional dedication, or physical modifications to the public right-of-way are proposed or required, the answer to this question is yes. For projects not subject to dedication and improvement requirements under the Los Angeles Municipal

Code, though the project does propose dedications or physical modifications to the public right-of-way, the answer to this question is yes. Based on a review of the proposed project, the following answer is provided:

- **Yes**, an 18-foot street dedication requirement and an 8-foot roadway widening improvement is required for Sepulveda Boulevard along the Project Site. Additionally, a 1-foot roadway widening improvement is required for Arizona Avenue along the Project Site. The Project Applicant is requesting a Waiver of Dedications and Improvements (WDI) pursuant to LAMC Section 12.37 I.3 to seek relief from the dedication and improvement requirements as they are not necessary to meet the City's mobility needs as outlined in Mobility Plan 2035, as set forth in detail in Appendix D of the *Transportation Assessment*.

As the answer is “yes” to one of the two screening criteria questions, further analysis is required to assess whether the Project would result in impacts due to geometric design hazards or incompatible uses.

Impact Criteria and Methodology

The impact criteria set forth in Appendix G of the CEQA Guidelines, as well as the City's TAG for substantially increasing hazards due to a geometric design feature or incompatible use (referred to a Threshold T-3) is defined as follows:

- *Threshold T-3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*
 - **No**, the Project would not substantially increase hazards due to a geometric design feature. Primary access the Project Site will continue to be provided via existing driveways along Sepulveda Boulevard and Arizona Avenue. Furthermore, the Additionally, the Project proposes to remove the existing northerly driveway along Arizona Avenue.

Preliminary project access plans are to be reviewed in light of commonly accepted traffic engineering design standards to ascertain whether any deficiencies are apparent in the site access plans which would be considered significant. The determination of significance shall be on a case-by-case basis, considering the following factors:

- The relative amount of pedestrian activity at project access points.
- Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.

- The type of bicycle facilities the project driveway(s) crosses and the relative level of utilization.
- The physical conditions of the site and surrounding area, such as curves, slopes, walks, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts.
- The project location, or project-related changes to the public right-of-way, relative to proximity to the High Injury Network or a Safe Routes to School program area.
- Any other conditions, including the approximate location of incompatible uses that would substantially increase a transportation hazard.

With respect to vehicle, bicycle and pedestrian safety impacts, the City's TAG (refer to Section 2.4.4 thereof) indicate that a review of all project access points, internal circulation, and parking access from an operational and safety perspective (for example, turning radii, driveway queuing, line of sight for turns into and out of project driveway[s]) should be conducted. Where project driveways would cross pedestrian facilities or bicycle facilities (bike lanes or bike paths), operational and safety issues related to the potential for vehicle/pedestrian and vehicle/bicycle conflicts and the severity of consequences that could result should be considered. In areas with moderate to high levels of pedestrian or bicycle activity, the collection of pedestrian or bicycle count data may be required.

Qualitative Review of Site Access Points

The Project Site has frontage along Sepulveda Boulevard, a Boulevard I with a posted speed limit of 45 miles per hour, and Arizona Avenue, a Local Street – Standard with an assumed speed limit of 25 miles per hour. The Project would improve the pedestrian experience along these corridors, including at the Project Site access points, which will enhance connections to and from the numerous pedestrian destinations in the direct vicinity of the Project Site. As previously noted, the Project would improve the sidewalks along the Sepulveda Boulevard and Arizona Avenue property frontages to enhance the pedestrian experience and ensure ADA compliance. Additionally, the Project proposes to provide a paseo which would include a pedestrian access point along Centinela Avenue, at the northeasterly portion of the Project Site. The sidewalk and driveway enhancements, as well as the pedestrian paseo from Centinela Avenue would reduce the potential for vehicle/pedestrian conflicts at the driveways. Excellent line of sight is provided for all modes of travel (motorists, pedestrians, and bicyclists) at the Project Site driveways. Improved sidewalks would be provided along both the Project Site's Sepulveda Boulevard and Arizona Avenue frontages, as well as along Centinela Boulevard north of the Project Site, and signalized crossings within convenient walking distance to the Project Site. The Project would not add site access points along the Project Site's Sepulveda Boulevard frontage. The Project would remove one site vehicular site access point along the Project Site's Arizona Avenue frontage, reducing the

number of curb cuts along the Project Site's Arizona Avenue frontage from two to one, with the southerly Arizona Avenue Driveway to remain. The Project Site and surrounding area are in good physical condition and located on flat terrain. The physical condition of the Project Site and proposed entry/exit points would be improved in conjunction with the Project and as such, the potential for vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts would be reduced. Neither Sepulveda Boulevard nor Arizona Avenue are noted in the City's HIN. Given the existing physical conditions of the Project Site and planned reduction of curb cuts along Arizona Avenue, no safety concerns related to geometric design are noted.

The driveways would be designed to comply with LADOT standards. The driveways would not require the removal or relocation of existing passenger transit stops and would be designed and configured to avoid or minimize potential conflicts with transit services and pedestrian traffic. No security gates or other parking control features are proposed along the Project Site driveways in close proximity to the public right-of-way. As discussed in a following section, no excessive vehicle queuing is anticipated at the Project Site driveways. The driveways would be improved to meet City standards to ensure adequate maneuvering by vehicles entering and exiting the Project Site. Thus, the Project would not substantially increase hazards due to a geometric design feature or incompatible use. Therefore, Project impacts related to Threshold T-3 would be less than significant.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact. All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department, Bureau of Engineering, and LAFD standards and requirements for design and construction. The drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Project.

Also, prior to issuance of a building permit, the Applicant would be required to submit parking and driveway plans to the Bureau of Engineering, LAFD, and LADOT for approval to ensure that the Project complies with code-required emergency access. Therefore, the Project would not result in any significant impacts related to emergency access.

Cumulative Impacts

Threshold T-1

Per the City's TAG, the analysis of cumulative consistency requires consultation and confirmation with LADOT and the City's Department of City Planning (LADCP). As with the Project, the related projects will include adequate bicycle facilities and include high-density urban uses in proximity to the nearby multimodal transportation facilities.

Furthermore, the Entrada Office Tower project, located across Centinela Avenue from the Project Site at 6161 Centinela Avenue, and the residential projects located south of the Project Site at 6711 and 6733 Sepulveda Boulevard are all under construction and will be completed prior to the construction and occupancy of the Project. The related projects, as with the Project, would not conflict with adjacent street designations and classifications. No street widenings would be necessary for these projects. Accordingly, there would be no significant cumulative impacts to which the Project, as well as other nearby related projects, would contribute to regarding transportation policies or standards adopted to protect the environment and support multimodal transportation options and a reduction in VMT. Based on the discussion and conclusion above for the Project, the guiding language contained in the City's TAG, and review of related projects in the Project Site vicinity, this documentation is sufficient to demonstrate that there is also no cumulative inconsistency with the City's plans, policies, ordinances and programs and therefore, the cumulative impacts of the Project in concert with the related projects would be less than significant.

Threshold T-2.1

As stated in the City's TAG (refer to Section 2.2.4 thereof), analyses should consider both short-term and long-term project effects on VMT. Short-term effects are evaluated in the detailed Project-level VMT analysis summarized above. Long-term, or cumulative, effects are determined through a consistency check with SCAG's RTP/SCS. The RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and GHG emissions reduction targets. As such, projects that are consistent with this plan in terms of development, location, density, and intensity, are part of the regional solution for meeting air pollution and GHG goals. Projects that are deemed to be consistent would have a less than significant cumulative impact on VMT. Development in a location where the RTP/SCS does not specify any development may indicate a significant impact on transportation. However, as noted in the City's TAG document, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., VMT per capita or VMT per employee) in the analysis, a less-than-significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact. Projects that fall under the City's efficiency-based impact thresholds are already shown to align with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS.

Based on the above Project-related VMT analysis and the conclusions reported in Section 4.2.2 of the *Transportation Assessment* (i.e., which conclude that the Project falls under the City's efficiency-based impact thresholds and thus are already shown to align with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS), the Project's cumulative VMT impact would be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

Less Than Significant With Mitigation Incorporated. A Sacred Lands File Search (SLFS) request was sent to the Native American Heritage Commission (NAHC) to determine if the Project Site is within the boundaries of any known sacred lands and/or whether any tribal cultural are known to exist on the Project Site. In response, the NAHC indicated that the results of the SLFS check conducted through the NAHC was positive. The City conducted Assembly Bill 52 (AB 52) consultation with the Gabrieleño Tongva Indians of California, who requested tribal monitoring during any ground-disturbing activities (refer to Mitigation Measure TCR-1, below).

Additionally, the Gabrieleño Tongva Indians of California noted that if any human remains are discovered at the Project Site, the human remains the Applicant would be required to comply with the State's Health and Safety Code Section 7050.5, which provides that in the event of discovery or recognition of any human remains at the Project Sites, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Los Angeles County Coroner has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the PRC. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC.

Further, the Gabrieleño Tongva Indians of California noted that if any tribal cultural resources are discovered at the Project Site, the Applicant would be required to comply with specific methods of recovery and reburial procedures that have been developed and adopted by the Gabrieleño Tongva Indians of California and as directed by the Tribal Monitor (refer to Mitigation Measure TRC-1).

Through compliance with Mitigation Measure TRC-1 and existing regulatory standards, Project impacts related to tribal cultural resources would be less than significant.

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a 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?

Less Than Significant With Mitigation Incorporated. Refer to response to Checklist Question XVIII (a), above.

Cumulative Impacts

Impacts related to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The City would require the applicants of each of the related projects to assess, determine, and mitigate any potential impacts related to tribal cultural resources that could occur as a result of development, as necessary. As discussed previously, through compliance with Mitigation Measure TRC-1 and existing regulations, Project impacts associated with historic, archaeological, and paleontological resources would be less than significant. However, the occurrence of these impacts would be limited to the Project Site and would not contribute to any potentially significant cultural resources impacts that could occur at the sites of the related projects. As such, the proposed Project would not contribute to any potential cumulative impacts related to cultural resources. Therefore, cumulative impacts related to cultural resources would be less than significant.

Mitigation Measures

To ensure that Project impacts related to tribal cultural resources would be less than significant, the following mitigation measure is required:

TRC-1: A qualified and certified indigenous tribal member of the Gabrieleño Tongva Indians of California shall provide professional Native American Monitoring for ground-disturbing activities associated with the Project. Ground disturbances including but not limited to the removal of asphalt/cement/slurry, trenching, boring, excavation, auguring, grubbing, tree removal, grading and drilling shall be monitored. The Tribal Monitor will only be required on site when these ground-disturbing activities occur.

The Tribal Monitor will be responsible for observing all mechanical and hand-labor excavations including paddle scrapers, blade machines, front-end loaders, back hoe, boring, and drill operations, as well as hydraulic and electric chisels. Associated work using tools such as picks and other non-electric or gasoline tools that are not regarded as mechanical will be monitored for their soil disturbances.

Soils that are removed from the work site shall be considered culturally sensitive and shall be subject to inspection. The Tribal Monitor will temporarily hold excavations until a determination is made on the sensitivity of the of the soil. If the soils are sensitive, an Tribal Monitor will verify the find and notify the Applicant.

The Tribal Monitor may make recommendations during the course of the activities when a cultural area has been impacted. The Tribal Monitor will be authorized to halt or redirect excavation activities to another area as an assessment is made.

The Tribal Monitor will provide the Applicant a written daily field report that includes photos of his/her accounting of the soil disturbances of the daily activities. The daily report will include observations the Tribal Monitor visually observed the project site at the beginning of each work day (i.e., weather conditions, overnight disturbances).

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Would the project require or result in relocation or the construction of new or expanded water, wastewater treatment, or storm water drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. As discussed below, Project impacts related to these issues would be less than significant.

Water Facilities

Local water conveyance infrastructure in the vicinity of the Project Site is maintained and operated by LADWP. The Project would connect to the existing water conveyance

infrastructure near the Project Site that includes a 12-inch main in Arizona Avenue, a 12-inch main in Centinela Avenue, and 12-inch and 36-inch mains in Sepulveda Boulevard. As shown on Table XIX-1, the Project's operational phase would consume approximately 40,622 gallons of water per day (or 0.04 mgd). It should be noted that this amount does not take into account the reduction in water consumption associated with the effectiveness of water conservation measures required in accordance with the City's Green Building Code, which would likely reduce the Project's water consumption (and wastewater generation) shown on Table XIX-1.

**Table XIX-1
Estimated Project Water Consumption and Wastewater Generation¹**

Proposed Use	Amount	Rate²	Total (gpd)
<u>Existing</u>			
Commercial	23,222 sf	50 gpd/1,000 sf	1,161
Restaurant	315 seats ³	30 gpd/seat	9,450
Total Existing			10,611
<u>Project</u>			
Residential			
Studio	126 du	75 gpd/du	9,450
1-bedroom	110 du	110 gpd/du	12,100
2-bedroom	126 du	150 gpd/du	18,900
Restaurant	359 seats ³	30 gpd/seat	10,783
Total Project			51,233
<i>(Less Existing)</i>			<i>(10,611)</i>
Net Total			40,622
<i>gpd = gallons per day du = dwelling unit</i>			
¹ Assumes wastewater generation is equivalent to water consumption.			
² Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Factors, April 6, 2012.			
³ Assumes 30 square feet per seat.			

For these reasons, the Project would not require or result in relocation or the construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Project impacts related to water facilities would be less than significant.

Cumulative Impacts

Implementation of the six related projects listed on Table 3-2 on page 31 of the *Transportation Assessment* prepared for the Project (refer to Appendix I) in concert with

the Project could result in an increased cumulative on water conveyance infrastructure. Table XIX-2 shows that the cumulative development would consume approximately 190,513 gallons of water per day (or 0.19 mgd per day). Of the six related projects listed on Table 3-2 on page 38 of the *Transportation Assessment Report* prepared for the Project (refer to Appendix I), four of the related projects are located in the City of Los Angeles and two are located in the City of Culver City. As with the Project, the applicants of the related projects would be subject to review by their respective water agencies to ensure that existing infrastructure would be adequate to meet the water demand requirements for each project. All development in both cities is subject to standard requirements regarding potential infrastructure improvements need to meet respective water infrastructure needs. Additionally, all development in both cities is required to comply with Fire Code requirement for fire flow and other fire protection requirements and are subject to ongoing evaluations by to ensure water conveyance infrastructure is adequate. Compliance with existing regulations would ensure that cumulative impacts related to water infrastructure would be less than significant.

**Table XIX-2
Estimated Cumulative Water Consumption and Wastewater Generation¹**

Land Uses	Size	Rate²	Total (gpd)
Residential	1,118 du ³	110 gpd/du	122,980
Office	201,240 sf	120 gpd/1,000 sf	24,148
Warehouse	-26,687 sf	30 gpd/1,000 sf	(800)
Commercial	-39,233	50 gpd/1,000 sf	(1,961)
		Subtotal	149,891
		<i>Plus Project</i>	<i>40,622</i>
		Total	190,513
<p><i>gpd = gallons per day du = dwelling unit sf = square feet</i></p> <p>¹ Assumes wastewater generation is equivalent water consumption. ² Source: City of Los Angeles Bureau of Sanitation, <i>Sewer Generation Factors</i>, April 6, 2012. ³ Conservatively assumes all units in related projects are 2-bedroom units.</p>			

Wastewater Treatment

Less Than Significant Impact. Sewer conveyance infrastructure serving the Project includes two 8-inch sewer mains flowing northerly, one 21-inch sewer main flowing northerly, and one 36-inch sewer force main flowing southerly in Sepulveda Boulevard. The 8-inch sewer main in Sepulveda Boulevard turns westerly through the Project Site via a 10-foot City sanitary sewer easement. This 9-inch sewer main ties into the 8-inch sewer main in Arizona Avenue and flows northerly and subsequently ties into the 21-inch sewer main located in Centinela Avenue. To allow for development of the Project and to accommodate the Project's wastewater flows, an existing 8-inch sewer line that crosses

the Project Site (refer to Figure 2-22 in Section 2 [Project Description]) would be removed, and a new 8-inch sewer line would be installed in Sepulveda Boulevard, traveling north to Centinela Boulevard, where the line would travel northwest to reconnect to the existing sewer line at Arizona Avenue and Centinela Boulevard.

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to accommodate both dry and wet weather days with a maximum daily flow of 450 million gallons per day (mgd) to and peak wet weather flows of 800 mgd.⁸⁰ Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the Los Angeles Regional Water Quality Control Board's (LARWQCB) discharge policies for the Santa Monica Bay. The HTP currently treats an average daily flow of approximately 260 mgd.⁸¹ Thus, there is approximately 190 mgd available capacity (based on dry weather flows). The Project would generate a net increase of approximately 40,622 gallons of wastewater per day (or 0.04 mgd) (refer to Table XIX-1), representing approximately 0.02 percent of the remaining wastewater treatment capacity. It should be noted that this amount does not take into account the net reduction in wastewater generation associated with existing uses that would be removed from the Project Site or the effectiveness of water conservation measures required in accordance with the City's Green Building Code, which would likely reduce the Project's water consumption (and wastewater generation) shown on Table XIX-1. With a remaining daily capacity of 190 mgd, the HTP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

Cumulative Impacts

Implementation of the related projects listed on Table 3-2 on page 31 of the *Transportation Assessment* prepared for the Project (refer to Appendix I) in concert with the Project could result in an increase the need for wastewater treatment. Table XIX-2 shows that the cumulative development in the Project Site area could result in the need to treat approximately 190,513 gallons of wastewater per day (or 0.19 mgd per day), representing approximately 0.1 percent of the remaining wastewater treatment capacity. It should be noted that this amount does not take into account the net decrease in wastewater generation that would occur as a result of removal of existing uses or the effectiveness of water conservation measures required in accordance with the City's Green Building Code, both of which would likely substantially reduce the cumulative water consumption and wastewater generation shown on Table XIX-2. With a remaining

⁸⁰ City of Los Angeles, Bureau of Sanitation, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrrp;jsessionid=jUrnVQbn9vgPkYhDPsPok0_6N2Et3-regkKyGDPGQOeIRw1AidG1!-2128337332!-2072722080?_afLoop=12329266215937952&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=16yw9t94vo_1#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D12329266215937952%26_afWindowMode%3D0%26_adf.ctrl-state%3D16yw9t94vo_5, accessed July 21, 2021.

⁸¹ City of Los Angeles, Bureau of Sanitation, *Sewer System Management Plan*, January 25, 2019. <https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf>, accessed November 20, 2020.

treatment capacity of approximately 190 mgd, the HTP would have adequate capacity to accommodate the wastewater treatment requirements of cumulative development. No new or upgraded treatment facilities would be required. Therefore, the cumulative wastewater impacts would be less than significant.

Storm Water Drainage

Less Than Significant Impact. As discussed in response to Checklist Question X(c)(iii) (Hydrology and Water Quality – Storm Drain Capacity), Project impacts related to storm drainage facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic X (Hydrology and Water Quality).

Electrical Power

Less Than Significant Impact. As discussed in response to Checklist Questions VII(a) and (b) (Energy), Project impact related to electric power facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic VII (Energy).

Natural Gas

Less Than Significant Impact. As discussed in response to Checklist Questions VII(a) and (b) (Energy), Project impact related to natural gas facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic VII (Energy).

Telecommunications

Less Than Significant Impact. In the Project Site area, existing telephone service is typically provided by AT&T, and existing cable television/internet is typically provided by Spectrum (formerly Time Warner Cable). The Project Site could be served by existing telecommunications facilities that are available in the Project Site area. The Project would require Project- and site-specific infrastructure to connect to the existing utilities, but the

Project would not require new or expanded facilities. Therefore, Project impacts related to telecommunications facilities would be less than significant.

Cumulative Impacts

All of the related projects listed on Table 3-2 on page 31 of the *Transportation Assessment* prepared for the Project (refer to Appendix I) are located in a 0.5-mile radius of the Project Site and within an urbanized area of the City. All of the related projects represent infill development and are served by existing utilities, including telecommunications infrastructure. As with the Project, the related projects would likely require project- or site-specific infrastructure to connect to the existing infrastructure, but the related projects would not require new or expanded facilities. Therefore, cumulative impacts related to telecommunications infrastructure would be less than significant.

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

Less Than Significant Impact. The Los Angeles Department of Water and Power (LADWP) provides water service to the Project Site. LADWP's water supply sources include the Los Angeles Aqueduct (LAA), local groundwater, the SWP (supplied by the Metropolitan Water District [MWD]), the Colorado River Aqueduct (also supplied by MWD), and recycled water.

The California Urban Water Management Planning Act of 1984 requires every municipal water supplier who serves more than 3,000 customers or provides more than 3,000 acre-feet per year (AFY) of water to prepare an Urban Water Management Plan (UWMP) every five years to identify short-term and long-term water resources management measures to meet growing water demands during normal, single-dry, and multiple-dry years. In the UWMP, the water supplier must describe the water supply projects and programs that may be undertaken to meet the total water use of the service area. The UWMP that is applicable to the Project is LADWP's 2020 UWMP.

The 2020 UWMP provides historical and forecasted water demands for the City. Total water demand varies annually and is contingent on various factors including: population growth, weather, water conservation, drought, and economically activity. Table XIX-3 shows a breakdown of historical water demand for the LADWP service area. Table XIX-4 provides LADWP's projected water demand from 2025 to 2045 for average year, single dry year, and multi dry year hydrological conditions. Demographic projections were provided for the LADWP service area by the Metropolitan Water District (MWD), who received the data from SCAG. SCAG applied its 2020 Regional Transportation Plan

demographic data to water service areas for MWD's member agencies. These data were expected to continue to grow over the next 25 years at a rate of 0.7 percent annually.⁸²

⁸² 2020 Urban Water Management Plan, LADWP, p. 1-5.

**Table XIX-3
Breakdown of Historical Water Demand for LADWP's Service Area**

Fiscal Year Ending Average	Single Family		Multi-Family		Commercial		Industrial		Government		Non- Revenue		Total
	AF	%	AF	%	AF	%	AF	%	AF	%	AF	%	AF
2016-2020	170,660	35%	141,088	28%	88,680	18%	14,938	3%	39,628	8%	40,690	8%	495,685
2011-2015	206,652	37%	161,592	29%	96,832	18%	17,855	3%	43,573	8%	26,139	6%	552,768
2006-2010	236,154	38%	180,277	29%	106,964	17%	23,196	4%	42,956	7%	30,617	5%	620,165
2001-2005	239,754	37%	190,646	29%	109,685	17%	21,931	3%	41,888	6%	52,724	8%	656,628
1996-2000	222,748	36%	191,819	31%	111,051	18%	23,560	4%	39,421	6%	33,696	5%	622,295
1991-1995	197,322	34%	177,104	30%	110,724	19%	21,313	4%	38,426	7%	39,364	7%	584,253
30-Year Average	212,215	36%	173,755	30%	103,990	18%	20,465	3%	40,982	7%	37,205	6%	588,611

AF = Acre Feet

Source: 2020 Urban Water Management Plan, LADWP.

**Table XIX-4
Service Area Reliability Assessment (AFY)**

Hydrological Conditions ¹	Years				
	2025	2030	2035	2040	2045
Average Year	642,600	660,200	678,800	697,800	710,500
Single Dry Year	674,700	693,200	712,700	732,700	746,000
Multi-Dry Year (Year 1)	657,900	675,800	694,900	714,400	727,400
Multi-Dry Year (Year 2)	661,700	679,700	698,900	718,500	731,500
Multi-Dry Year (Year 3)	674,400	693,200	712,800	732,700	746,000
Multi-Dry Year (Year 4)	661,600	679,600	698,900	718,400	731,500
Multi-Dry Year (Year 5)	655,700	673,600	692,600	712,000	724,900

AFY = acre-feet per year

Source: 2020 UWMP, LADWP, Exhibits 11E, 11F, and 11G.

As discussed under Checklist topic XIV (Population and Housing), Project's development would not exceed the growth assumptions of the 2020-2045 RTP/SCS. Based on its 2020 UWMP, LADWP has supply capabilities that would be sufficient to meet expected demands from 2025 through 2045 under single dry-year and multiple dry-year hydrologic conditions.

The Project would connect to the existing water conveyance infrastructure near the Project Site that includes a 12-inch main in Arizona Avenue, a 12-inch main in Centinela Avenue, and 12-inch and 36-inch mains in Sepulveda Boulevard. As shown on Table XIX-1, the Project would consume an increase of approximately 40,622 gallons of water per day. According to LADWP, for any project that is consistent with the City's General Plan, the projected water demand associated with that project is considered to be accounted for in the most recently adopted UWMP, prepared by the LADWP to ensure that existing and projected water demand within its service area can be accommodated.⁸³ As discussed previously, the Project is consistent with the City's General Plan land use designation for the Project Site. Additionally, the Project Applicant would be required to comply with the water efficiency standards outlined in Los Angeles City Ordinance No. 180,822 and in the LAGBC to minimize water usage. Further, prior to issuance of a building permit, the Project Applicant would be required to consult with LADWP to determine Project-specific water supply service needs and all water conservation measures that shall be incorporated into the Project. The Project Applicant has conducted preliminary consultation with LADWP regarding water supply (and other utility issues), and LADWP has preliminarily confirmed that the Project's water demand can be served by existing water supplies.⁸⁴ As such, the Project would not require new or additional water supply or entitlements. Therefore, no significant Project impacts related to water supply would occur.

Cumulative Impacts

Table XIX-2 shows that the cumulative development would consume approximately 190,513 gallons of water per day (or 0.19 mgd per day). Of the six related projects listed on Table 3-2 on page 38 of the *Transportation Assessment* prepared for the Project (refer to Appendix I), four of the related projects are located in the City of Los Angeles and two are located in the City of Culver City. The related projects in Los Angeles fall under LADWP's 2020 UWMP, while the related projects in Culver City fall under the Golden State Water Company's (GSWC) 2020 UWMP, both of which anticipate meeting projected water supplies through the year 2045, through conservation measures and strategies for drought years. Similar to the Project, each related project would be required to comply with their respective conservation programs for both water supply and

⁸³ Los Angeles Department of Water and Power, Amir Tabakh, correspondence, February 11, 2015.

⁸⁴ Los Angeles Department of Water and Power, Liz Gonzalez, Manager, correspondence, November 13, 2020. Refer to Appendix J.

infrastructure. For these reasons, cumulative impacts related to water would be less than significant.

c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. Refer to response to Checklist Question XIX(a) (Utilities and Service Systems – Wastewater Treatment).

Cumulative Impacts

Refer to the cumulative impacts discussion included in response to Checklist Question XIX(a) (Utilities and Service Systems – Wastewater Treatment).

d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. The landfills that serve the City and the capacity of these landfills are shown on Table XIX-5. As shown, the landfills have an approximate available daily intake of 18,366 tons. As shown on Table XIX-6 it is estimated the Project would generate a net increase of approximately 0.67 tons of solid waste per day. This total is a conservative and does not account the reduction in solid waste associated with removal of the existing uses from the Project Site or the effectiveness of recycling efforts, which the Project would be required by the City to implement. With a remaining daily intake capacity of approximately 18,366 tons of solid waste per day, the landfills serving the City could accommodate the Project's approximately net increase of 0.67 tons of solid waste per day.

The Project's solid waste would be handled by private waste collection services. Pursuant to Section 66.32 of the LAMC, the Project's solid waste contractor must obtain, in addition to all other required permits, an Assembly Bill 939 (AB 939) Compliance Permit from the Los Angeles Bureau of Sanitation (LASAN). The Project would be required to comply with LAMC Section 12.21 A.19, which requires new development to provide an adequate recycling area or room for collecting and loading recyclable materials. Additionally, the Project would be required to comply with CALGreen Code waste reduction measures for the operation of the Project. Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program. For these reasons, the Project would not generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, and would not otherwise impair the attainment of solid waste reduction goals. Therefore, Project impacts related to solid waste would be less than significant.

**Table XIX-5
Landfill Capacity**

Landfill Facility	Estimated Remaining Life (years)	Estimated Remaining Disposal Capacity (million tons)	Permitted Intake (tons/day)	Daily Disposal (tons/day)	Available Daily Intake (tons/day)
Sunshine Canyon	18	69.7	12,100	6,387	5,713
Chiquita Canyon	28	56.9	12,000	5,525	6,475
Antelope Valley	18	10.9	3,600	2,113	1,487
Lancaster	22	9.9	3,000	363	3,137
Calabasas	8	4.3	3,500	1,946	1,554
Total					18,366
<i>Source: County of Los Angeles, Countywide Integrated Waste Management Plan, 2019 Annual Report, December 2020.</i>					

**Table XIX-6
Estimated Project Solid Waste Generation**

Proposed Use	Amount	Rate¹	Total (tpd)
<u>Existing</u>			
Commercial	23,222 sf	0.005 lbs/sf/day	0.05
Restaurant	9,448 sf	0.005 lbs/sf/day	0.02
Total Existing			0.07
<u>Project</u>			
Residential	362 du	4.0 lbs/du/day	0.72
Restaurant	10,783 sf	0.005 lbs/sf/day	0.02
Total Project			0.74
<i>(Less Existing)</i>			<i>(0.07)</i>
Net Total			0.67
<i>tpd = tons per day lbs = pounds du = dwelling unit sf = square feet</i>			
¹ <i>Source: City of Los Angeles Bureau of Sanitation, "Solid Waste Generation," 1981.</i>			

Cumulative Impacts

As shown on Table XIX-7, implementation of the Project in conjunction with the related projects in the Project Site area would result in an estimated solid waste generation of approximately 3.25 tons per day. It should be noted that this amount does not take into account the net decrease in solid waste generation that would occur as a result of removal of existing uses or the effectiveness of recycling measures required in accordance with existing City's recycling regulations, both of which would likely substantially reduce the cumulative solid waste generation shown on Table XIX-7.

**Table XIX-2
Estimated Cumulative Solid Waste Generation**

Land Uses	Size	Rate ¹	Total (tpd)
Residential	1,118 du	4.0 lbs/du/day	2.23
Office	201,240 sf	0.005 lbs/sf/day	0.50
Warehouse	-26,687 sf	0.005 lbs/sf/day	(0.06)
Commercial	-39,233	0.005 lbs/sf/day	(0.09)
Subtotal			2.58
<i>Plus Project</i>			<i>0.67</i>
Total			3.25
<i>gpd = gallons per day du = dwelling unit sf = square feet</i>			
¹ Assumes wastewater generation assumes water consumption. ² Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, March 20, 2002. ³ Conservatively assumes all units in related projects are 2-bedroom units.			

With a remaining daily capacity of approximately 17,826 tons of solid waste per day, the landfills serving the Project and related project would have adequate capacity to accommodate cumulative solid waste generation. Additionally, all development in the City is required to comply with City and state recycling regulations. Therefore, cumulative impacts related to solid waste generation would be less than significant.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Refer to response to Checklist Question XIX(d) (Solid Waste Facilities and Regulations).

Cumulative Impacts

Refer to the cumulative impact analysis under response to Checklist Question XIX(d) (Solid Waste Facilities and Regulations).

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project Site is not located near or within the boundaries of a state responsibility area or land classified as very high fire hazard severity zone. Thus, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Therefore, no impacts related to this issue would occur as a result of the Project.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or uncontrolled spread of a wildfire?

No Impact. The Project Site is not located near or within the boundaries of a state responsibility area or land classified as very high fire hazard severity zone. Thus, the Project would not expose project occupants to, pollutant concentrations from a wildfire or uncontrolled spread of a wildfire. Therefore, no impacts related to this issue would occur as a result of the Project.

c) Requires the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project Site is not located near or within the boundaries of a state responsibility area or land classified as very high fire hazard severity zone. Thus, the Project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Therefore, no impacts related to this issue would occur as a result of the Project.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project Site is not located near or within the boundaries of a state responsibility area or land classified as very high fire hazard severity zone. Thus, the Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

Neither the Project Site nor any of the sites of the related projects are located near or within the boundaries of a state responsibility area or land classified as very high fire hazard severity zone. Therefore, no cumulative impacts related to this issue would occur.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

Less Than Significant With Mitigation Incorporated. With implementation of Mitigation Measure PMM NOISE-1 from the 202-2045 RTP/SCS (amended for Project specifics and identified as Mitigation Measure NOISE-1), the Project’s construction-related impacts on the noise environment would be less than significant. In consideration of this fact, coupled with the reasons stated in this Sustainable Communities Environmental Assessment, the Project would not 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.

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)?

Less Than Significant Impact. For the reasons stated in this Sustainable Communities Environmental Assessment, the Project would not result in any significant impacts would not have the potential to contribute to significant cumulative impacts.

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

Less Than Significant Impact. For the reasons stated in this Sustainable Communities Environmental Assessment, the Project would not cause substantial adverse effects on human beings, either directly or indirectly.